

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOSE GUZMAN,

Plaintiff,

Case No.

-against-

1:16-cv-03499-GBD

MEL S. HARRIS AND ASSOCIATES, LLC
LR CREDIT 13, LLC

MEL S. HARRIS

DAVID WALDMAN

KERRY H. LUTZ

TODD FABACHER

MICHAEL YOUNG

SAMSERV, INC.

JOHN ANDINO

WILLIAM MLOTOK,

Defendants.

- - - - -x

DEPOSITION of LARA GUZMAN, the
Non-Party witness, taken by Defendants,
pursuant to Order, held at the offices of Law
Offices of Ahmad Keshavarz, 16 Court Street, 26th
Floor, Brooklyn, New York 11241 on June 16, 2017,
at 10:33 a.m., before Marva Clarke, a Shorthand
Reporter and Notary Public for the State of New
York.

JOB NO. 125288

APPEARANCES:

LAW OFFICES OF AHMAD KESHAVARZ
Attorneys for Plaintiff
16 Court Street
Brooklyn, New York 11241

BY: AHMAD KESHAVARZ, ESQ.

HERBERT SMITH FREEHILLS
Attorneys for Defendant LR Credit 13, LLC
450 Lexington Avenue
New York, New York 10017

BY: ROBERT GROSSMAN, ESQ.

O'HARE PARNAGIAN
Attorneys for Defendants Samserv, Inc.
William Mlotok
82 Wall Street
New York, New York 10005

BY: JEFFREY LICHTMAN, ESQ.

Also Present:

NANAXHI CHAVEZ, Spanish interpreter
Morningside Translation

L. Guzman
NANAXHI CHAVEZ,
called as the official interpreter in
this matter, was duly sworn by a
Notary Public of the State of New York
to accurately and faithfully translate
the questions propounded to the
witness from English into Spanish and the
answers given by the witness from Spanish
into English.

-oOo-

LAURA GUZMAN,
the witness herein, having been first
duly sworn by a Notary Public (Marva
Clarke) of the State of New York, was
examined and testified through the
interpreter as follows:

BY THE REPORTER:

Q. Please state your name for the
record.

A. Lara Guzman.

Q. What is your current address?

A. 20 West Euclid Street, Valley

IT IS HEREBY STIPULATED AND AGREED,
by and among counsel for the respective parties
hereto, that the filing, sealing and certification
of the within deposition shall be and the same are
hereby waived.

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to form of the
question, shall be reserved to the time of the
trial.

IT IS FURTHER STIPULATED AND AGREED.
that the within deposition may be signed before
any Notary Public, with the same force and effect
as if signed and sworn to before the Court.

~ oOo ~

L. Guzman
Stream, New York 11580.

BY MR. GROSSMAN: Good morning,
Ms. Guzman. Thank you very much for
coming in today.

THE WITNESS: Good morning.

MR. GROSSMAN: My name is Robert
Grossman. I am an attorney for one
of the defendants in this case L.R.
Credit 13, and if the other attorneys
could please introduce themselves and
who they represent.

MR. LICHTMAN: My name is
Jeffrey Lichtman, and I'm
representing Defendants Sam Serv,
Inc., and William Mlotok.

MR. KESHAVARZ: I am Ahmad
Keshavarz, and I represent Jose
Guzman and Lara Guzman.

EXAMINATION

BY MR. GROSSMAN:

Q. We will be asking a number of
questions today. When I finish, the other
attorneys may have questions for you as
well.

Page 6

1 L. Guzman
 2 If at any point you don't
 3 understand one of my questions, please tell
 4 me and I can try and explain or rephrase it.
 5 A. Okay.
 6 Q. Counsel may object to the
 7 questions that I ask. Unless he directs you
 8 not to answer, you should answer the
 9 question if you can.
 10 A. Okay.
 11 Q. Ms. Guzman, you've taken an oath
 12 to tell the truth today; do you understand
 13 that?
 14 A. Yes.
 15 Q. Can you please state your full
 16 name for the record.
 17 A. Yes. Laura M. Comuzzi Guzman.
 18 Q. What is your current address?
 19 A. 20 West Euclid Street, Valley
 20 Stream, New York 11580.
 21 Q. Are you currently employed?
 22 A. Yes.
 23 Q. Where are you currently
 24 employed?
 25 A. Siena Marble and Tile,

Page 8

1 L. Guzman
 2 Market.
 3 Q. Did you work together for a
 4 period of time before you began seeing each
 5 other or dating?
 6 A. Yes, but let's say just as
 7 co-workers.
 8 Q. For how long did you work
 9 together at Sea Market?
 10 A. Since 2007 until 2012.
 11 Q. You both worked together at Sea
 12 Market throughout that entire period?
 13 A. Well, for example, the owner has
 14 three supermarkets. I'd go to all the
 15 supermarkets because I was in the accounting
 16 department. Jose was part of the company,
 17 but we weren't always in the same
 18 supermarket.
 19 Q. What was your position in this
 20 group of supermarkets at that time?
 21 A. Well, the title that they gave
 22 me was bookkeeper, although I was an
 23 accountant.
 24 Q. Did there come a time when you
 25 married Mr. Guzman?

Page 7

1 L. Guzman
 2 S-I-E-N-A.
 3 Q. For how long have you worked at
 4 Siena Marble and Tile?
 5 A. 2015.
 6 Q. Do you recall when in 2015 you
 7 started at Siena Marble and Tile?
 8 A. No, I don't remember.
 9 Q. Do you recall whether it was in
 10 the spring or in the winter?
 11 MR. KESHAVARZ: Objection of
 12 form.
 13 A. Let me think.
 14 Q. Take your time.
 15 A. 2015. It was toward the end of
 16 the summer.
 17 Q. When you began working at Siena
 18 Marble and Tiles was your husband employed
 19 there?
 20 A. Yes.
 21 Q. When did you meet your husband?
 22 A. I met him in 2007.
 23 Q. Where did you meet him?
 24 A. We worked together at the
 25 supermarket. At that time it was called Sea

Page 9

1 L. Guzman
 2 A. Yes.
 3 Q. When was that?
 4 A. December 2010.
 5 Q. Did you live together prior to
 6 that time?
 7 A. No.
 8 Q. Did you live together after that
 9 time --
 10 A. Yes.
 11 Q. -- beginning in December 2010?
 12 A. Yes.
 13 Q. In what location?
 14 A. In Long Island, Valley Stream.
 15 Q. Was that on Euclid Street, the
 16 current address?
 17 A. Yes, we've always lived in the
 18 same address.
 19 Q. Ms. Guzman, you sometimes review
 20 your husband's bank account statements; is
 21 that correct?
 22 MR. KESHAVARZ: Objection of
 23 form.
 24 Q. Unless your counsel directs you
 25 not to answer, you may answer the question.

Page 10

1 L. Guzman
2 A. Okay. Well, we do it together.
3 Q. Does your husband have a
4 checking account at Chase Bank?
5 A. Yes.
6 Q. Does he have a checking and
7 savings account at Citibank?
8 A. Yes.
9 Q. Does he have any other checking
10 or savings accounts currently?
11 A. No.
12 Q. Do you and your husband have any
13 joint accounts?
14 A. No.
15 Q. Do you have any checking or
16 savings accounts in your name?
17 MR. KESHAVARZ: Objection of
18 form.
19 A. Yes.
20 Q. What checking or savings
21 accounts do you have?
22 MR. KESHAVARZ: Objection of
23 form.
24 A. Checking and savings; what do
25 you mean accounts?

Page 12

1 L. Guzman
2 A. Around a thousand.
3 Q. Did there come a time in 2012
4 when you ceased working at Sea Market group
5 of grocery stores?
6 A. Yes.
7 Q. Were you employed somewhere else
8 immediately following that?
9 A. Well, I left Sea Market because
10 I became pregnant. So after I had my baby
11 it was about two months after that I got a
12 new job.
13 Q. Where was that job?
14 A. It was called Grabar.
15 Q. And what kind of business is
16 that?
17 A. It's a seafood distributor for
18 restaurants and hotels.
19 Q. How long did you work at Grabar?
20 A. Three years.
21 Q. What was your position?
22 A. Account payables.
23 Q. Approximately what was your
24 annual salary?
25 MR. KESHAVARZ: Objection of

Page 11

1 L. Guzman
2 Q. At which bank?
3 MR. KESHAVARZ: Objection to
4 form.
5 A. Chase.
6 Q. Is it a checking account?
7 MR. KESHAVARZ: Objection of
8 form.
9 A. Yes.
10 Q. Do you have any other checking
11 or savings accounts?
12 MR. KESHAVARZ: Objection of
13 form.
14 A. No.
15 Q. For how long have you had a
16 checking account at Chase Bank?
17 MR. KESHAVARZ: Objection of
18 form.
19 A. 2011.
20 Q. I'm not asking for an exact
21 number, but do you have a sense
22 approximately how much money was in the
23 checking account at that time?
24 MR. KESHAVARZ: Objection of
25 form.

Page 13

1 L. Guzman
2 form.
3 A. 42,000.
4 Q. When did you cease working at
5 Grabar?
6 A. When I went to work for Siena.
7 Q. That was around late summer
8 2015?
9 A. I'm approximating. I'm not
10 sure.
11 Q. Understood. Why did you leave
12 Grabar to work at Siena?
13 A. They were offering me better
14 conditions, and the work environment was
15 more -- well, how can I explain -- the
16 distributor company always smelled like
17 fish. It's the truth.
18 So sometimes after work - you
19 know how sometimes you're tight with time
20 and sometimes after work I have to leave a
21 little early you have an appointment, like
22 you have to go to the school or do
23 something.
24 I always have to leave a little
25 early, go home, change, bathe. It was

Page 14

1 L. Guzman
2 something so horrible.
3 Q. And what was your position at
4 Siena?
5 A. Bookkeeper.
6 Q. Do you recall your approximate
7 annual salary?
8 A. 42,000.
9 Q. How did you find the job at
10 Siena?
11 A. I don't remember.
12 Q. Did your husband help you find a
13 job?
14 A. It's possible. No, no. I don't
15 remember exactly.
16 Q. But your husband was already
17 working at Siena Marble when you began
18 working there; is that correct?
19 A. Yes.
20 Q. Is it fair to say that you
21 learned about the existence of Siena Marble
22 through your husband?
23 A. Yes.
24 Q. So you don't recall if he told
25 you about the open position, but you learned

Page 15

1 L. Guzman
2 about the company through him?
3 MR. KESHAVARZ: Objection to
4 form. Asked and answered.
5 A. Yes. I don't remember if I gave
6 him a resume and he took it, yes.
7 Q. Do you recall whether he
8 recommended you?
9 A. It was like a formal
10 recommendation?
11 Q. Formal or informal?
12 A. Yes, probably.
13 Q. Do you recall for how long your
14 husband had been at Siena Marble before you
15 joined the company?
16 A. I think he started working there
17 January or February 2015 until I started at
18 the end of the summer.
19 Q. Do you recall when he left Siena
20 Marble?
21 A. No, I don't remember.
22 Q. Do you recall why he left?
23 A. His job was to drive a truck.
24 The deliveries were delicate because the
25 merchandise was very expensive.

Page 16

1 L. Guzman
2 After he received a letter from
3 his employer saying they were going to seize
4 his salary he was stressed: He didn't feel
5 like he could drive a truck, like he could
6 have an accident. It just wasn't the right
7 time.
8 Q. Do you recall if this was a
9 month after you started; six months after
10 you started?
11 A. Can you ask the question again.
12 Q. Sure. For how long had you been
13 working at Siena Marble before your husband
14 became aware of a letter sent to his
15 employer?
16 A. Very little. That's why I was
17 so embarrassed.
18 MR. LICHTMAN: Can I hear that
19 question one more time, please.
20 [The requested portion of the
21 record was read back by the
22 reporter.]
23 Q. Did you see the letter that was
24 sent to his employer?
25 A. Yes. It's in the -- no, just

Page 17

1 L. Guzman
2 leave it like that.
3 MR. KESHAVARZ: Can you read
4 back that last question.
5 [The requested portion of the
6 record was read back by the
7 reporter.]
8 Q. When did you see the letter?
9 A. I believe that the employer when
10 he sent the letter he gave him a copy
11 because he brought it home.
12 Q. Your husband brought the letter
13 home?
14 A. Yes.
15 Q. Did he say anything to you about
16 the letter?
17 A. He was very concerned. We
18 didn't know what to do. We were afraid like
19 what is going to happen now. How are we
20 going to pay the rent.
21 The greatest confusion was who
22 are these people because we didn't know who
23 they were.
24 Q. Were you able to read the
25 letter?

Page 18

1 L. Guzman
 2 A. Yes.
 3 Q. Are you able to read English?
 4 A. Yes.
 5 Q. What did your husband do after
 6 receiving the letter?
 7 A. Well, he wanted to know what
 8 that was about. We knew that we needed to
 9 go to court to look for the case because we
 10 didn't know who it was. He didn't know who
 11 wanted to seize his salary because he didn't
 12 remember ever going to that financial
 13 institution.
 14 He was very worried. Where do I
 15 go to court; are they going to take my case;
 16 do I need an attorney.
 17 Q. Do you recall whether there was
 18 the name of an attorney or a phone number
 19 that was listed on the letter your husband
 20 received?
 21 A. No.
 22 MR. GROSSMAN: Can we mark this
 23 as Exhibit 16.
 24 (Whereupon, Defendants'
 25 Exhibit 16, document was hereby

Page 19

1 L. Guzman
 2 marked for identification, as of this
 3 date.)
 4 A. So even so if there had been the
 5 name of an attorney and a phone number, I'm
 6 not the type of person who would have called
 7 whatever it said on the letter. I would
 8 have found the source of it, and gone to
 9 court.
 10 MR. KESHAVARZ: So the record
 11 is clear, it's Exhibit 16 because
 12 we're continuing the numbers of
 13 exhibits from Mr. Guzman's
 14 deposition.
 15 MR. GROSSMAN: That's correct.
 16 Q. Take as much time as you need to
 17 look at the document.
 18 A. I remember it well because all
 19 the drama started with this.
 20 Q. Do you see the name of a law
 21 firm listed at the bottom of the letter?
 22 A. Yes.
 23 Q. And there is a phone number
 24 listed, correct?
 25 A. Yes.

Page 20

1 L. Guzman
 2 Q. Why didn't you contact the
 3 attorney who is listed at the bottom of
 4 this?
 5 A. Well, when I read this I went
 6 into the computer to see who was Harris;
 7 with all due respect I have to say I didn't
 8 read very good things.
 9 So I was not going to call these
 10 people because we assumed immediately that
 11 this was a fraud.
 12 Q. You said you wanted to get to
 13 the source?
 14 A. Yes.
 15 Q. So what did you do next?
 16 A. My husband asked for a day off.
 17 He went to court to try to look for this
 18 index number.
 19 Q. Did you go with him?
 20 A. No, no, I had to work.
 21 Q. Did your husband tell you what
 22 happened in court?
 23 A. Yes, he told me he requested the
 24 index number, and that unfortunately they
 25 couldn't give it to him at that moment.

Page 21

1 L. Guzman
 2 That he had to come back, and they gave him
 3 a date.
 4 Q. What did your husband do after
 5 that?
 6 A. He had to ask for another
 7 morning off, so he could go on that date --
 8 so he can go on that date to look for the
 9 index number.
 10 Q. Did you go with him on that
 11 occasion?
 12 A. No. I had to work.
 13 Q. Did he tell you what happened
 14 when he went to court?
 15 MR. KESHAVARZ: Objection of
 16 form.
 17 A. When he arrived they told him,
 18 again, I'm sorry, we need more time but they
 19 moved the files.
 20 I don't remember what the
 21 explanation was, and so the nightmare
 22 continued because we still didn't know what
 23 that was.
 24 Q. And what did your husband do
 25 next?

Page 22

1 L. Guzman

2 A. He went a third time. So again,
3 he had to request time off from work, he was
4 able to obtain a copy.

5 Q. Did you go with him on that
6 occasion?

7 A. No.

8 Q. What did he tell you about that
9 time?

10 A. He told me that he read it.
11 Well, it says here L.R. Credit but he was
12 trying to look for who was suing him, which
13 financial institution.

14 When he read U.S.A. First Bank,
15 he confirmed what he already researched on
16 the computer that these people were lying.

17 Q. What did he do next?

18 A. That same day while in court.
19 Well, I don't know exactly who told him, but
20 he went to one of those windows. I don't
21 know if they call it an office number, and
22 so he asked in his sort of English what to
23 do because he just received a copy of this
24 index number, and he didn't know what it
25 was.

Page 23

1 L. Guzman

2 Q. And just to be clear you weren't
3 with him at the courthouse when this
4 happened?

5 A. No.

6 Q. Because he explained to you what
7 happened at the courthouse?

8 A. He told me everything.

9 Q. What happened after your husband
10 asked what to do?

11 A. That same person at court said
12 oh, no, then can you ask the Judge to reopen
13 the case. So then my husband said give me
14 the papers, what do I need to do, what is
15 the process.

16 Oh, and the other important
17 thing was that my husband was asking why am
18 I just finding out about this now, now that
19 the case is supposedly closed and lost.

20 And that person said, okay, well
21 fill out these papers and fill out the
22 points, the items where it says you don't
23 know U.S.A. Bank, and fill out the fact that
24 you didn't receive the case, the papers for
25 the case so you can defend yourself.

Page 24

1 L. Guzman

2 Q. Did you understand this
3 paperwork was the process to reopen up the
4 case?

5 A. Yes, because we had already
6 checked it in the computer.

7 Q. I'm sorry, checked what in the
8 computer?

9 A. I went into Google, and I typed
10 "What do you do when you receive a
11 garnishment, and you didn't receive anything
12 about the case," and Google gave me some
13 answers.

14 Q. And do you know whether your
15 husband filed the papers to reopen the case?

16 A. Of course.

17 Q. Approximately when was this
18 done?

19 A. Well, after the letter. I don't
20 know what the date on it is. After he
21 received the letter.

22 After the employer gave him a
23 copy, taking the days to go to court to look
24 for the file and then after the third time,
25 it could have been a month.

Page 25

1 L. Guzman

2 Q. Did you help him complete the
3 paperwork?

4 A. He brought the paperwork home.
5 We reviewed it together. That's when I told
6 him I understand everything, but I'm not an
7 expert. It would be good if someone can
8 review it. Also, to research it in the
9 computer because I know all courts have
10 something pro bono.

11 So I looked for the schedule
12 that pro bono had at court. It's one day a
13 week which is very few hours. Again, he
14 asked for the afternoon off and he went to
15 get in line.

16 It was hours because there are
17 so many people, but finally someone saw him
18 and that's where they helped him to make
19 sure that what he had filled out was
20 correct.

21 MR GROSSMAN: This was
22 previously marked yesterday. You can
23 mark this as 17. It's an affidavit
24 and support of order to show cause to
25 vacate default judgment.

Page 26

1 L. Guzman
 2 (Whereupon, Defendants'
 3 Exhibit 17, affidavit and support of
 4 order to show cause to vacate default
 5 judgment was hereby marked for
 6 identification, as of this date.)
 7 MR. LICHTMAN: I believe this is
 8 also Exhibit 4 in the deposition of
 9 Mr. Guzman.
 10 THE WITNESS: Can I ask you if
 11 you represent Mel Harris?
 12 MR. GROSSMAN: No, I do not
 13 represent Mel Harris.
 14 Here's the exhibit, if you want
 15 to look at it first, Exhibit 17.
 16 A. Okay.
 17 Q. Have you seen this document
 18 before; you can take as much time as you
 19 need?
 20 A. Yes, I have seen it.
 21 Q. Is this the document that you
 22 helped your husband prepare?
 23 A. This is the document where we
 24 asked the judge to please reopen the case so
 25 we can defend ourselves.

Page 28

1 L. Guzman
 2 A. Yes, because I think it had a
 3 lot of sections. I think this is a shorter
 4 one.
 5 Q. I'd like to draw your attention
 6 to the third page, and take a minute to
 7 review.
 8 A. Okay.
 9 Q. And there is a section that
 10 reads I also have one or more meritorious
 11 defenses; is that correct?
 12 A. Yes.
 13 Q. Did you help your husband fill
 14 out this portion of the document?
 15 A. I read all of this, and I knew
 16 what was true and that it didn't apply. And
 17 I'll tell you again pro bono helped him
 18 correct, or see if there was something more
 19 or less in there, because this has very
 20 technical vocabulary.
 21 MR. GROSSMAN: Can you read
 22 back my question.
 23 [The requested portion of the
 24 record was read back by the
 25 reporter.]

Page 27

1 L. Guzman
 2 MR. LICHTMAN: I think the
 3 question was not to describe the
 4 document, but whether you helped
 5 prepare it.
 6 MR. KESHAVARZ: Objection,
 7 vague. It does not say what section
 8 of the document.
 9 A. This is the document that we
 10 tried to fill out, but we want to make sure
 11 that we didn't make any errors. And I
 12 assume that this is the document that the
 13 pro bono or the legal company helped him
 14 prepare.
 15 Q. We'll try this again. I'm not
 16 sure that answered my colleagues question.
 17 I understand this document was shown to
 18 Claro.
 19 Did you also help your husband
 20 to fill it out?
 21 MR. KESHAVARZ: Objection,
 22 vague. It does not state which
 23 section of the document.
 24 Q. Did you help your husband fill
 25 out any section of this document?

Page 29

1 L. Guzman
 2 MR. KESHAVARZ: Objection of
 3 form.
 4 A. No, I don't remember.
 5 Q. Do you see where a box is
 6 checked: I do not owe the money?
 7 A. Yes.
 8 Q. Do you know whether your husband
 9 told you if he owed the money that was the
 10 subject of the default judgment?
 11 MR. KESHAVARZ: Objection of
 12 form.
 13 MR. GROSSMAN: That's the end
 14 of your objection.
 15 MR. KESHAVARZ: I can say it.
 16 MR. GROSSMAN: No, you can't.
 17 MR. LICHTMAN: No, you can't.
 18 MR. GROSSMAN: You can answer.
 19 A. By this time we already had the
 20 index, and my husband was already certain
 21 that he had never opened an account at
 22 U.S.A. First Bank.
 23 MR. GROSSMAN: Read it back.
 24 [The requested portion of the
 25 record was read back by the

Page 30

1 L. Guzman
 2 reporter.]
 3 MR. KESHAVARZ: Objection of
 4 form, vague. Does not define which
 5 debt you're referring to. L.R.
 6 Credit or Reported Credit.
 7 Q. You can answer.
 8 A. Whatever the names of the
 9 companies are, the names in the lawsuit was
 10 U.S.A. First Bank.
 11 And my husband definitely from
 12 the first moment he read that name he said
 13 this is not mine. I do not owe this money.
 14 Q. Do you recall whether your
 15 husband filed this document at any point?
 16 MR. KESHAVARZ: Objection of
 17 form.
 18 A. Of course, he presented it to
 19 the Judge.
 20 Q. And what happened?
 21 A. First, when he presented it to
 22 the Judge, he had to get another date
 23 because first there's the date when the
 24 Judge says I accept hearing this.
 25 Q. Were you at that court

Page 32

1 L. Guzman
 2 MR. KESHAVARZ: She can answer.
 3 MR. GROSSMAN: If in fact it is
 4 an answer to the question.
 5 MR. KESHAVARZ: You can finish,
 6 and then you can make your objection
 7 to her answer.
 8 A. The letter said that we refuse
 9 to go to the traverse hearing, so if you
 10 sign these papers the case could be
 11 dismissed. I don't know what the term is,
 12 but it would finish.
 13 MR. GROSSMAN: Move to strike
 14 that portion of the answer that's not
 15 responsive.
 16 MR. KESHAVARZ: That's an
 17 objection like when I say objection
 18 to form. You don't have to worry
 19 about that.
 20 Q. What happened next?
 21 A. My husband and I read the letter
 22 because it came home. We were even
 23 surprised because we said, oh, they have our
 24 address so how come when it started they
 25 couldn't find me.

Page 31

1 L. Guzman
 2 appearance?
 3 A. No.
 4 Q. This is what your husband told
 5 you?
 6 A. Yes.
 7 Q. Do you know what happened next?
 8 A. After the day that he went with
 9 the Judge?
 10 Q. Yes. After the first court
 11 appearance?
 12 A. After the first appearance, the
 13 Judge gave him a traverse hearing. I think
 14 that's the name of the hearing.
 15 Q. Do you recall what happened
 16 next?
 17 A. He wasn't able to make it to
 18 that traverse hearing because we received
 19 another letter.
 20 Q. What did that letter say?
 21 A. That letter again there was a
 22 fraud.
 23 Q. Because of that letter you
 24 didn't attend the next hearing?
 25 A. No, that letter said --

Page 33

1 L. Guzman
 2 Q. Can I draw your attention back
 3 to what's been marked as Exhibit 17.
 4 Is there an address listed on
 5 the last page of that document?
 6 A. Yes, my address. Yes, our
 7 house.
 8 Q. Is that the same address where
 9 you received a letter from the no Harris law
 10 firm that you were just described?
 11 A. Yes.
 12 MR. GROSSMAN: Can we mark this
 13 as 18.
 14 (Whereupon, Defendants'
 15 Exhibit 18, two-page document, second
 16 page caption, "Stipulation to Vacate
 17 Judgment and Discontinue Action,"
 18 October 2, 2013 was hereby marked for
 19 identification, as of this date.)
 20 MR. GROSSMAN: I believe that
 21 Exhibit 18 at this is identical as
 22 Exhibit 9 in the deposition of Jose
 23 Guzman.
 24 For the record, this is a
 25 two-page document. On the second

1 L. Guzman
 2 page is a document with the caption
 3 titled, "Stipulation to Vacate
 4 Judgment and Discontinue Action,"
 5 dated October 2, 2013.
 6 MR. KESHAVARZ: Just to be
 7 clear, it's a letter addressed to
 8 Lincoln Square.
 9 Q. Take as much time as you need.
 10 My question is whether you recognize this
 11 document?
 12 (Witness reviews the document.)
 13 A. Yes, of course.
 14 Q. What is this document?
 15 A. This is the document that this
 16 attorney on behalf of my husband is accepted
 17 to dismiss the case.
 18 Q. Is it signed by the counsel that
 19 was representing your husband?
 20 A. These are the Clara attorneys.
 21 Q. Does it appear to be signed by
 22 them?
 23 A. Well, they were representing my
 24 husband.
 25 Q. Does it appear to be signed by

1 L. Guzman
 2 them?
 3 A. I wouldn't know. They are such
 4 a technical thing.
 5 Q. But do you see two signatures on
 6 the second page?
 7 A. Yes.
 8 Q. Do you understand what the
 9 effect of this document was?
 10 MR. KESHAVARZ: Objection to
 11 form.
 12 A. Of course, that they are going
 13 to discontinue the action. That we weren't
 14 going to go to that traverse.
 15 Q. Do you understand what the
 16 effects of this document was as to the
 17 judgment that had been entered against your
 18 husband?
 19 MR. KESHAVARZ: Objection of
 20 form.
 21 A. I understand it, because when
 22 they sent one that's similar to this one.
 23 This wasn't the first one. The one that we
 24 didn't know whether to sign or not.
 25 Q. Ms. Guzman, I asked you about

1 L. Guzman
 2 this document. Do you understand what the
 3 effect of this document was on the default
 4 judgment that had been executed against your
 5 husband?
 6 MR. KESHAVARZ: Objection of
 7 form.
 8 A. That it's done.
 9 Q. That the default judgment was
 10 vacated?
 11 MR. KESHAVARZ: Objection of
 12 form.
 13 A. Yes.
 14 Q. That it no longer existed?
 15 MR. KESHAVARZ: Objection to
 16 form.
 17 A. Yes.
 18 Q. Was your husband unemployed for
 19 a time after he left Siena?
 20 A. No.
 21 Q. Where was he employed after
 22 Siena?
 23 A. Well, he decided to go to the
 24 supermarket which had been his activity his
 25 whole life. He went to a supermarket called

1 L. Guzman
 2 A.C. Roosevelt Food.
 3 Q. Roosevelt Food?
 4 A. Yes.
 5 Q. Do you know how long he worked
 6 in A. C. Roosevelt Food?
 7 A. I estimate about three months,
 8 but I can't tell you exactly how long.
 9 Q. Do you know why his employment
 10 ended?
 11 A. Yes.
 12 Q. Why was that?
 13 A. Should I tell the story.
 14 Q. Yes, if you know?
 15 A. The owner of the supermarket had
 16 some freezers. The mechanics had been there
 17 many times to repair them, and the mechanic
 18 said that there really wasn't much to be
 19 done with the freezers. That they needed to
 20 be replaced until one day they just stopped
 21 working.
 22 So the owner who was upset about
 23 the situation just took it out on my
 24 husband. He blamed him. Like he hadn't
 25 checked on them, something like that.

Page 38

1 L. Guzman

2 So my husband said no, you've
3 already known for a long time that they are
4 almost done. Why are you blaming me.

5 So the ex-boss. He had really a
6 short temper, so my husband said it would
7 just be best if we end things now. I am
8 returning the keys, and I'll get another
9 job.

10 Q. Did your husband feel he had
11 been wrongly accused about the damage to the
12 freezer?

13 A. This man's frustration was so
14 great that he needed to take it out on
15 someone.

16 Q. This man being your husband's
17 supervisor?

18 A. He was the owner of the
19 supermarket.

20 Q. Did your husband feel that he
21 had been wrongly accused?

22 A. Yes, because if you know that
23 these freezers are at the end of their life
24 span you can't say it's because you didn't
25 call a mechanic or, of course, if you saw

Page 39

1 L. Guzman

2 that something was wrong why didn't you call
3 the mechanic sooner.

4 Q. And was he upset by these
5 accusations?

6 A. Because of the way he was
7 treated.

8 Q. Do you own a car?

9 A. Yes.

10 Q. Who uses your car the most
11 often?

12 A. I have two leases under my name.
13 I use one and my husband uses the other.

14 Q. The car your husband uses, he
15 used to drive to work; is that right?

16 A. Yes.

17 Q. For how long has he used your
18 car to drive to work?

19 A. No, I don't remember.

20 Q. Was he using your car to drive
21 to work in 2016?

22 A. Last year?

23 Q. Yes.

24 A. Yes.

25 Q. Do you know in 2015 as well?

Page 40

1 L. Guzman

2 A. Yes.

3 Q. Do you ever drive with your
4 husband?

5 A. If he drives, and I am with him?

6 Q. Well, are you both ever in the
7 car at the same time?

8 A. Yes.

9 Q. Who usually drives?

10 A. When he's very tired he asks me
11 to drive.

12 Q. And if he's not tired?

13 A. He drives.

14 Q. Is your husband a good driver?

15 A. Yes.

16 Q. Do you worry about your safety
17 when he drives?

18 A. No.

19 Q. That's good. Are you concerned
20 that he might get into an accident?

21 A. Not because of the way he
22 drives. Of course I worry, I'm his wife.

23 Q. That's understandable.

24 Do you recall a time around 2010
25 when your husband was in a car accident?

Page 41

1 L. Guzman

2 A. I don't think we were married
3 yet.

4 Q. Did you know your husband in
5 2010?

6 A. Yes.

7 Q. Do you recall a time when Jose
8 Guzman was injured in a car accident around
9 2010?

10 A. Yes.

11 Q. What happened?

12 A. He was stopped at a light, and I
13 think there was a van or a truck that hit
14 him.

15 Q. Was your husband injured?

16 A. Yes.

17 Q. Can you describe the injury?

18 A. Something in the back and he had
19 to undergo surgery.

20 Q. Do you know what type of
21 surgery?

22 A. Laparoscopic.

23 Q. Does he still suffer any
24 negative effects from the injuries?

25 A. Sometimes he complains yes, he

1 L. Guzman
2 has pain here in the back, but everything is
3 within what the doctor said could happen.

4 Q. The doctor said you could have
5 lingering back pain?

6 A. That after the surgery it
7 improved a lot, but he could still feel
8 pains some time.

9 Q. And do those pains still
10 continue until this day?

11 A. Not as much that I know of.

12 Q. Have you collected any bank or
13 credit card statements in connection with
14 this case?

15 MR. KESHAVARZ: Just to be
16 clear, he's not asking about any
17 communication as with us. He's just
18 asking if you collected these things.

19 A. Like collected for what?

20 MR. LICHTMAN: For the purposes
21 of this lawsuit.

22 THE WITNESS: I don't
23 understand.

24 Q. That's okay.

25 MR. GROSSMAN: Mark these.

1 L. Guzman

2 (Whereupon, Defendants'

3 Exhibit 19, Citibank checking and
4 savings account statements of Jose
5 Guzman opened in November 2016 was
6 hereby marked for identification, as
7 of this date.)

8 MR. GROSSMAN: I'm marking the
9 Citibank checking and savings account
10 statements of Jose Guzman.

11 This was also marked as
12 Exhibit 10 at the deposition of Jose
13 Guzman.

14 A. Okay.

15 Q. Do you recognize these
16 documents, Ms. Guzman?

17 A. Yes.

18 Q. Did there come a time when you
19 collected these documents for the purposes
20 of this lawsuit?

21 MR. KESHAVARZ: Objection of
22 form. I instruct her not to answer.

23 If you strike the last phrase, I
24 think you'll be fine.

25 Q. Did there come a time when you

1 L. Guzman
2 collected these bank statements?

3 MR. KESHAVARZ: You can answer.

4 Q. I'm not asking whether you gave
5 them to your counsel or when you gave them
6 to your counsel.

7 MR. KESHAVARZ: Just if you
8 gathered them.

9 A. Yes.

10 Q. At the time you gathered these
11 bank statements, did you also gather other
12 bank statements?

13 A. Yes.

14 Q. The statements for Mr. Guzman's
15 Chase Bank account?

16 A. Yes.

17 Q. And the statements for Mr.
18 Guzman's credit cards?

19 A. Yes.

20 Q. You gathered all those documents
21 at the same time?

22 MR. KESHAVARZ: Objection to
23 form.

24 A. Are you referring to within the
25 same day?

1 L. Guzman

2 Q. Same week?

3 MR. KESHAVARZ: Objection of
4 form.

5 A. Yes.

6 Q. When was that?

7 MR. KESHAVARZ: Objection of
8 form.

9 A. I don't remember.

10 Q. Was it last week?

11 A. No.

12 Q. Was it over a month ago?

13 A. Yes. More than one month I
14 think.

15 Q. More than two months?

16 A. No. I don't think so, no.

17 Q. You collected all of these bank
18 statements in or around the same week; is
19 that correct?

20 MR. KESHAVARZ: Objection of
21 form.

22 A. I think it was within the same
23 week.

24 Q. Was there any occasion when you
25 collected Mr. Guzman's banking statements?

Page 46

1 L. Guzman
 2 MR. KESHAVARZ: Objection of
 3 form.
 4 A. Are you referring to a different
 5 occasion like something separate from this
 6 lawsuit?
 7 Q. No, within this lawsuit.
 8 A. I don't remember exactly, but --
 9 no, I don't remember dates.
 10 Q. Did there come a time in
 11 November 2016 when your husband received a
 12 significant deposit in his Citibank account?
 13 MR. KESHAVARZ: Just to be
 14 clear, he's not asking the source,
 15 he's just asking if.
 16 A. Yes.
 17 Q. How much was that payment to the
 18 Citibank account?
 19 A. 20,000. This is what you're
 20 asking about.
 21 Q. It is. What was your reaction
 22 when your husband received that?
 23 A. Mine?
 24 Q. Yes.
 25 MR. KESHAVARZ: Again, he's not

Page 48

1 L. Guzman
 2 the nonresponsive portions of the
 3 answer.
 4 MR. KESHAVARZ: You don't need
 5 to worry about the objection.
 6 I have a stipulation. Can I use
 7 this translator to talk to my client?
 8 That doesn't waive any
 9 attorney-client privilege.
 10 MR. GROSSMAN: That's fine. I
 11 just ask that you not discuss this
 12 deposition.
 13 MR. GROSSMAN: I just have a
 14 couple of questions and I'll wrap it
 15 up.
 16 Q. I just have a couple of
 17 questions about Exhibit 18 which we looked
 18 at before the stipulation to vacate judgment
 19 and discontinue action.
 20 MR. KESHAVARZ: This is the one
 21 that's dated October 2, 2015.
 22 Q. We discussed before, and I
 23 understood that you understood that this
 24 document vacated the judgment and
 25 discontinued the action in this case; is

Page 47

1 L. Guzman
 2 asking where the money came from.
 3 A. Well, my reaction was well,
 4 finally justice is being served.
 5 Q. You were pleased?
 6 A. Well, not so much on the figure.
 7 On it's own it's like, okay, good. Finally
 8 they know you were speaking the truth.
 9 Q. Regardless of the reason?
 10 MR. KESHAVARZ: Objection to
 11 form.
 12 A. I don't understand, what do you
 13 mean.
 14 Q. If \$20,000 was deposited in your
 15 husband's account, were you pleased?
 16 MR. KESHAVARZ: Objection of
 17 form. Asked and answered.
 18 Q. You can answer.
 19 A. I was pleased, but I'll tell you
 20 again it's not because of the amount that
 21 was deposited.
 22 It was finally justice was being
 23 served that they believing what he was
 24 saying was the truth.
 25 MR. GROSSMAN: Move to strike

Page 49

1 L. Guzman
 2 that correct?
 3 MR. KESHAVARZ: Objection of
 4 form.
 5 Q. You can answer.
 6 A. Are you asking me if I
 7 understand what this is?
 8 Q. It's the same thing we discussed
 9 before.
 10 A. What it implies?
 11 Q. Exactly, yes, what it means.
 12 MR. KESHAVARZ: Objection, asked
 13 already.
 14 Q. I'm not asking about --
 15 MR. KESHAVARZ: Wait until she
 16 translates.
 17 A. You've not letting me mention
 18 the first letter. In order for me to
 19 explain this, I have to answer the first
 20 letter.
 21 MR. KESHAVARZ: Were you done
 22 with what you were about to say?
 23 THE WITNESS: No.
 24 Q. Go ahead.
 25 A. I have to mention the first

Page 50

1 L. Guzman
 2 letter because the first letter --
 3 MR. GROSSMAN: I'd like to
 4 instruct the witness to answer my
 5 question.
 6 MR. KESHAVARZ: No, you asked a
 7 question.
 8 You can answer.
 9 MR. KESHAVARZ: You can move to
 10 say it's not responsive. You asked a
 11 question, so she gets to answer how
 12 she feel appropriate and then you get
 13 to make your objection that you feel
 14 appropriate.
 15 MR. GROSSMAN: It has to be an
 16 answer to my question.
 17 MR. KESHAVARZ: That's why you
 18 can make objections as
 19 non-responsive.
 20 That's not proper. You can
 21 finish your answer.
 22 A. Well, I'm going to describe it
 23 from a different angle.
 24 This letter since you like it
 25 when I talk about this letter. This letter,

Page 52

1 L. Guzman
 2 She answers the question the way
 3 she thinks is appropriate, but it's
 4 inappropriate when you're
 5 interrupting.
 6 I don't think you're doing it
 7 intentionally, so just so the record
 8 is clear. There's no need to yell.
 9 I'm just asking her if she was
 10 done with her answer.
 11 THE WITNESS: No.
 12 MR. KESHAVARZ: So finish your
 13 answer.
 14 A. I insist I would like to respond
 15 by comparing it to the other letter,
 16 otherwise I have no way of explaining it
 17 because I don't know the terminology.
 18 MR. GROSSMAN: There's no
 19 question pending.
 20 MR. KESHAVARZ: There was a
 21 question pending.
 22 MR. GROSSMAN: That question has
 23 been answered.
 24 MR. KESHAVARZ: No, let me
 25 finish.

Page 51

1 L. Guzman
 2 this is the right one.
 3 It means that this case is over,
 4 but the one that filed the case against my
 5 husband is still responsible for potential
 6 future trials or judgments.
 7 Q. Those would be judgments brought
 8 by your husband against the plaintiff in
 9 this lawsuit, correct?
 10 MR. KESHAVARZ: Objection to
 11 the form of the question.
 12 A. I don't know the technical
 13 language, that's why the way that I can
 14 explain it is when I compare it to the other
 15 letter.
 16 Q. That's fine.
 17 MR. KESHAVARZ: Were you done
 18 with your answer?
 19 MR. LICHTMAN: Are you coaching
 20 the witness not to be done with her
 21 answer?
 22 You asked her if she's done.
 23 She's thinking if she's done with her
 24 answer.
 25 MR. KESHAVARZ: Let me finish.

Page 53

1 L. Guzman
 2 You asked a question. She can
 3 answer how she feels appropriate.
 4 Then after she's done with her
 5 answer, you can make an appropriate
 6 objection, if you find it
 7 unresponsive.
 8 I'm not saying you're doing it
 9 on purpose, but it's inappropriate to
 10 cut her off while she's talking.
 11 MR. GROSSMAN: She finished.
 12 You instructed her to continue, and
 13 that's what happened here.
 14 MR. KESHAVARZ: I think you
 15 started interrupting her before she
 16 was done.
 17 MR. GROSSMAN: I disagree. I
 18 think you prompted her to continue.
 19 MR. KESHAVARZ: The record will
 20 show.
 21 MR. GROSSMAN: It will and it
 22 has.
 23 Can I finish with my next
 24 question.
 25 MR. KESHAVARZ: Are you done

1 L. Guzman
 2 with your answer or not?
 3 MR. LICHTMAN: Can we just get
 4 the question read back.
 5 MR. KESHAVARZ: No. If she's
 6 not done, you can't interrupt her.
 7 Are you done with your answer or
 8 not? I don't have a feeling one way
 9 or another, I'm just asking you if
 10 you're done.
 11 THE WITNESS: No, I'm not done.
 12 MR. KESHAVARZ: Okay. Please
 13 finish.
 14 A. You asked me many times if I
 15 understood what this meant, right?
 16 Q. I don't have to answer
 17 questions.
 18 MR. KESHAVARZ: Just go ahead
 19 and say whatever you want to say.
 20 A. You asked me if I understood
 21 what the significance of this was. My
 22 answer is that I know because number 2 where
 23 it says "with prejudice" that was the term
 24 that we were trying to research along with
 25 my husband, that it changes the whole

1 L. Guzman
 2 to make sure that she has the
 3 opportunity. Because there is a
 4 translator, I think there is a lag
 5 here so if you can just pause for a
 6 moment, when they're done just pause.
 7 MR. GROSSMAN: I want to be
 8 clear for the record that I think
 9 what you're doing is improper, and
 10 when the witness stops speaking and
 11 is giving a responsive answer to the
 12 question, you improperly prompted her
 13 to speak more.
 14 And I also want to reflect that
 15 the questioner has been pausing and
 16 has not been rushing to ask the next
 17 question, and it is obvious to
 18 everyone or at least obvious to me.
 19 I won't speak for everyone but
 20 that's to me that questions have had
 21 a reasonable pause before we
 22 continue.
 23 MR. KESHAVARZ: If you're done,
 24 your done. If you're not, please
 25 finish the answer.

1 L. Guzman
 2 meaning.
 3 MR. KESHAVARZ: Are you done?
 4 MR. GROSSMAN: Are you going to
 5 ask her each time she stops with a
 6 sentence?
 7 MR. KESHAVARZ: No, because
 8 you're jumping in before she's done.
 9 MR. GROSSMAN: That is not true.
 10 Her voice went down. She stopped
 11 speaking. It's a normal conversation
 12 that is going on.
 13 Her answer was done. We are not
 14 going to tolerate you asking her each
 15 time she's finishes answering a
 16 question, if she's done. You've done
 17 that now three or four times.
 18 MR. KESHAVARZ: It's just that
 19 there is a translator, and there is a
 20 pause and that's natural when there
 21 is a translator.
 22 So I think you pause when the
 23 translator is done. Just pause for a
 24 moment. Because I think I don't care
 25 if she is done or not. I just want

1 L. Guzman
 2 MR. GROSSMAN: I have another
 3 question.
 4 MR. KESHAVARZ: That you can
 5 ask after she finishes answering.
 6 A. Once we were sure that this
 7 document was correct that's when we
 8 presented it.
 9 So with this we knew that this
 10 judgment was done, but that there was still
 11 a possibility for another judgment. No, not
 12 that another judgment, but that they would
 13 still be liable in case Guzman wanted to
 14 proceed and file a lawsuit.
 15 MR. GROSSMAN: Can you read back
 16 the last portion of the witness'
 17 answer.
 18 [The requested portion of the
 19 record was read back by the
 20 reporter.]
 21 Q. When you say we knew that this
 22 judgment was done, do you mean you knew that
 23 the judgment was vacated?
 24 MR. KESHAVARZ: Objection to
 25 the form of the question.

Page 58

1 L. Guzman
 2 THE INTERPRETER: Can you repeat
 3 the question.
 4 Q. You had said we knew that the
 5 judgment was done; I know you've answered
 6 this before, I'm just trying to restate it
 7 because it relates to my next question.
 8 A. Either way I'm not the party.
 9 I'm not Jose Guzman. I am his wife.
 10 Q. You testified that we knew that
 11 the judgment was done, correct?
 12 MR. KESHAVARZ: Objection to
 13 the form of question.
 14 Answer if you know.
 15 A. Well, that it was done. That we
 16 didn't have to appear at that traverse
 17 hearing.
 18 Q. Did you have an understanding
 19 that the judgment was vacated?
 20 MR. KESHAVARZ: Objection to
 21 the form.
 22 A. Yes.
 23 Q. When you say we, you mean you
 24 and your husband Jose Guzman; is that
 25 correct?

Page 60

1 Confidential-L. Comuzzi Guzman
 2 BY MR. GROSSMAN:
 3 Q. What is your birth date?
 4 MR. KESHAVARZ: Move to
 5 designate this sentence as
 6 "Confidential."
 7 A. August 8, 1969.
 8 (Continued in non-confidential
 9 portion of transcript.)
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 59

1 L. Guzman
 2 MR. KESHAVARZ: Objection to
 3 the form.
 4 MR. GROSSMAN: Thank you. No
 5 further questions.
 6 EXAMINATION
 7 BY MR. LICHTMAN:
 8 Q. Good afternoon.
 9 A. Good afternoon.
 10 Q. Can I just have your name
 11 spelled for me, please.
 12 A. L-A-U-R-A.
 13 Q. After that you have M?
 14 A. Yes.
 15 Q. What is the full name?
 16 A. Marcella with a C.
 17 Q. What was the next name?
 18 A. Guzman.
 19 Q. But there was a name in between
 20 Guzman?
 21 A. My maiden name?
 22 Q. Yes.
 23 A. C-O-M-U-Z-Z-I, Guzman.
 24 (The following portion deemed
 25 confidential, under separate cover.)

Page 61

1 L. Guzman
 2 BY MR. GROSSMAN:
 3 Q. Where were you born?
 4 A. Argentina.
 5 Q. When did you move from
 6 Argentina?
 7 A. 2002.
 8 Q. Where did you move to?
 9 A. Valley Stream.
 10 Q. Where in Valley Stream did you
 11 first live?
 12 A. Do you want the address?
 13 Q. Yes.
 14 A. 40 South Franklin Avenue, 11580.
 15 Q. How long did you live at that
 16 address approximately?
 17 A. Seven years.
 18 Q. Where did you move to after you
 19 left the South Franklin Avenue address?
 20 A. To my current address at 20 West
 21 Euclid Street.
 22 Q. How many years of education have
 23 you had?
 24 A. Many.
 25 Q. Tell us about them.

Page 62

1 L. Guzman

2 What education level did you
3 have when you left Argentina?4 A. I'm a public accountant in
5 Argentina.6 Q. So you graduated high school,
7 correct?8 A. Yes. I was at the university
9 for five years. In my country that career
10 is five years.11 Q. So when you graduated the
12 university, you were already licensed as a
13 public accountant; is that correct?14 A. No, because I got married and
15 then I had children, my daughters.16 Q. So you were married to someone
17 other than Mr. Guzman?

18 A. Yes.

19 Q. So your marriage to Mr. Guzman
20 is your second marriage?

21 A. Yes.

22 Q. And it's his second marriage as
23 well, right?

24 A. Yes.

25 Q. So let me just go back to the

Page 63

1 L. Guzman

2 university.

3 Which university did you attend
4 in Argentina?5 A. It's called Belgrano,
6 B-E-L-G-R-A-N-O, University.7 Q. What degree did you have when
8 you graduated from Belgrano University?9 A. It was a bachelor's degree in
10 accounting.11 Q. Did you take any other degree
12 while you were in Argentina?13 A. No, not while I was in
14 Argentina.15 Q. Did you have any full-time
16 employment when you were in Argentina?

17 A. No, part time.

18 Q. What was your part-time
19 employment starting with, from when you were
20 in the university?21 A. It was a shopping center in the
22 auditing department.23 Q. How long did you have that
24 part-time job?

25 A. One.

Page 64

1 L. Guzman

2 Q. When did you graduate Belgrano
3 University, what year?

4 A. '92.

5 Q. So you were in Argentina for ten
6 years after you graduated the university; is
7 that right?

8 A. Yes.

9 Q. For that ten-year period you had
10 no full-time job; is that right?11 A. Not in a company because we
12 owned a bus. It was a hardware store and we
13 sold materials for construction, so I don't
14 count that as a part-time job because we
15 owned it.16 Q. Tell me, please, what years you
17 worked in the family business of the
18 hardware store.

19 A. Six, seven years.

20 Q. What was your job there?

21 A. To pay the bills.

22 Q. Were you also in charge of the
23 collection of bills, accounts receivable?24 MR. KESHAVARZ: Objection of
25 form.

Page 65

1 L. Guzman

2 A. Let me remember. Yes, but
3 there wasn't much because everything was
4 paid by check or credit card.5 Q. Did you have a specific title
6 when you were there?

7 A. Working for the company?

8 Q. Yes.

9 A. No.

10 Q. So it wasn't like a financial
11 officer?

12 A. No, it was a family business.

13 Q. Did you after graduating
14 Belgrano University take any further courses
15 related to accounting?

16 A. In Argentina.

17 Q. Anywhere in the United States?

18 A. Here, yes; Argentina, no.

19 Q. Where did you study?

20 A. In H&R Block taxes.

21 Q. What course or courses did you
22 take there?

23 A. Personal taxes, not corporate.

24 Q. How long was -- was this one
25 course or more than one course for personal

1 L. Guzman
2 taxes?
3 A. Just one.
4 Q. Sometimes you're answering in
5 English, and sometimes you're waiting for
6 the translator.
7 A. Oh, sorry.
8 Q. You've done it again, but that's
9 okay. I just want to make sure we end up
10 with an accurate transcript.
11 Did you study English in
12 Argentina?
13 A. Yes.
14 Q. How many years of English did
15 you have in Argentina?
16 A. My dad started sending me at a
17 very young age, but I didn't pay attention
18 until I was a little older.
19 Q. And you work now at Siena
20 Marble?
21 A. Yes.
22 Q. And you've been there since the
23 middle of 2015?
24 MR. KESHAVARZ: Objection of
25 form.

1 L. Guzman
2 from before, right?
3 A. Yes, but the supermarket has
4 it's specific things and they had to teach
5 me.
6 Q. When you got your BA in
7 accounting was that because accounting was
8 your major?
9 A. I don't understand the question.
10 Q. It might be because I'm thinking
11 of the American system of my higher
12 education.
13 How many courses did you take
14 when you were going for your BA degree?
15 A. Many. Are you referring to the
16 subjects?
17 Q. Well, I'm just assuming you
18 would enroll in courses that would give you
19 credit towards your ultimate degree, and I'm
20 asking how many of those courses were
21 related to accounting?
22 A. It's different, you don't
23 choose. The courses are already stipulated.
24 Accounting, 1, 2, 3 advanced. Auditing.
25 Q. Did you take more than 15

1 L. Guzman
2 A. Yeah, more or less.
3 Q. I just want to fill in the
4 timeline between the time you came to the
5 United States, and the time you started
6 working for Siena Marble.
7 So what was your first job in
8 the United States?
9 A. Well, I taught some music
10 classes, and then I started working at the
11 Siena markets.
12 Q. When did you start working at
13 the Sea Market?
14 A. I don't remember if it was at
15 the end of 2006, or at the beginning of
16 2007.
17 Q. When you started working at Sea
18 Market what was your job?
19 A. Well, they trained me so I could
20 be alone at the office. The title was
21 bookkeeper.
22 Q. Who trained you?
23 A. Another bookkeeper who had been
24 there for many years.
25 Q. But you already knew accounting

1 L. Guzman
2 courses in accounting?
3 A. When you say courses, are you
4 referring to credits?
5 Q. Classes.
6 A. How many classes did you say?
7 Q. 15 in the five years that you
8 were there?
9 A. Are you referring to everything
10 like taxes, auditing, accounting, economics,
11 commercial law, everything?
12 Q. Just the accounting courses.
13 A. In that case accounting 1,
14 account 2, advanced accounting, auditing and
15 also accounting of costs, so five.
16 Q. And you took business law as
17 well, right?
18 A. Yes.
19 Q. Now when you came to the United
20 States, you said you took one course at H&R
21 Block for accounting.
22 Did you take any other
23 accounting classes in the United States?
24 A. No.
25 Q. When you came to the United

Page 70

1 L. Guzman
 2 States, did you take additional classes in
 3 English?
 4 A. Yes.
 5 Q. What classes did you take in
 6 English?
 7 A. I don't remember the name, but
 8 in Nassau Community College they have a
 9 program. It's advanced, it's very fast and
 10 it's in English.
 11 Q. And you took one of those
 12 courses?
 13 A. The program had three courses.
 14 Q. Over how long a period of time?
 15 A. Three semesters.
 16 Q. In your job at Siena Market,
 17 do you regularly use English?
 18 A. All the time.
 19 Q. The documents that you have to
 20 read are in English in relation to that job?
 21 A. Yes.
 22 Q. The documents that you have to
 23 generate are written in English by you?
 24 A. Yes.
 25 Q. When you came to the United

Page 71

1 L. Guzman
 2 States, you went directly to Valley Stream?
 3 A. Yes.
 4 Q. Why did you choose Valley
 5 Stream?
 6 A. That's where my mom lived and my
 7 siblings live there.
 8 Q. These are people in the Comuzzi
 9 family?
 10 A. Yes.
 11 Q. The person who owns Siena Marble
 12 who is that?
 13 A. There are three partners.
 14 Q. Who are they?
 15 A. You want the names?
 16 Q. Yes.
 17 A. William, T-U-S-T-I-N.
 18 Q. Who else?
 19 A. There's Nancy Tustin and Pablo
 20 Comuzzi.
 21 Q. Are you related to Pablo
 22 Comuzzi?
 23 A. Yes.
 24 Q. How are you related to him?
 25 A. He's my brother.

Page 72

1 L. Guzman
 2 Q. Does he live in Valley Stream?
 3 A. No.
 4 Q. So he's an owner. Does he also
 5 work there, Pablo?
 6 A. Yes, of course.
 7 Q. What is his job?
 8 A. Well, he sells tiles and marble.
 9 Q. When you applied for the job at
 10 Siena Marble, did you speak to your brother
 11 Pablo before getting the job?
 12 A. In which sense?
 13 Q. Did you ask him if there was a
 14 job opening?
 15 A. No. Because I never liked
 16 mixing his business with the family.
 17 Q. Did he tell you that he had a
 18 job opening?
 19 A. No, things didn't really work
 20 out that way. I think I sent my resume for
 21 them to consider it at some point, whenever
 22 they needed help.
 23 Q. Well, let me ask you this.
 24 You were married to Mr. Guzman
 25 in 2010; is that right?

Page 73

1 L. Guzman
 2 A. Yes.
 3 Q. Do you know how it came about
 4 that Mr. Guzman started working at Siena
 5 Marble?
 6 A. Well, let me see if I remember.
 7 No, I don't remember.
 8 Q. Were there any conversations
 9 between you and your brother Pablo Comuzzi
 10 about your husband Mr. Guzman working there
 11 before you were hired?
 12 A. We're not that type of family to
 13 have so many conversations about work and
 14 family.
 15 Q. How did your husband find out
 16 about the business at Siena Marble?
 17 MR. KESHAVARZ: Objection of
 18 form.
 19 A. I think it's because Pablo
 20 invited us for dinner and his partner was
 21 there William, and my husband approached
 22 him. He's the one who is making the
 23 decisions.
 24 Q. Which decisions does William
 25 make?

Page 74

1 L. Guzman

2 A. Well, I don't know much about
3 the financial area. That's something
4 private amongst the partners, but I know
5 they consult each other when they have to
6 hire someone, and they have to be in
7 agreement to see if they want to employ that
8 person.

9 Q. Are you related to anyone else
10 who works at Siena Marble?

11 A. Directly, like direct family?

12 Q. Let's start with directly, and
13 then we'll go to indirectly?

14 A. No, directly.

15 Q. Who are you indirectly related
16 to at?

17 A. Nancy Tustin is Pablo Comuzzi's
18 wife.

19 Q. Anyone else?

20 A. No.

21 Q. Is Mr. Guzman related to anyone
22 at Siena Marble?

23 A. No.

24 Q. Either directly or indirectly?

25 A. No. To me with the rest of

Page 75

1 L. Guzman

2 them, no.

3 Q. Are you or your husband personal
4 friends with anyone at Siena Marble?

5 A. No.

6 Q. Now, what is your specific job
7 at Siena Marble?

8 A. Accountant.

9 Q. What are your responsibilities
10 at Siena Marble as an accountant?

11 A. Well, most, I make payment,
12 check bank statements reconcile. Also, I
13 collect but really not that much because
14 they mostly pay with debit or check. At the
15 end of the year they share the information
16 with the external accountants of the
17 company.

18 Q. Let me just go back to one thing
19 before I forget.

20 You said Nancy is your brother's
21 wife; is that correct?

22 A. Yes.

23 Q. What is the relationship, if
24 any, between Nancy Tustin and William
25 Tustin?

Page 76

1 L. Guzman

2 A. They are siblings.

3 Q. So is William Tustin Pablo
4 Comuzzi's brother-in law?

5 A. Yes.

6 Q. Is anyone employed at Siena
7 Marble directly related to William Tustin
8 other than Nancy and Pablo?

9 A. No.

10 Q. Is anyone at Siena Marble
11 related to Nancy Tustin other than Pablo and
12 William?

13 A. No.

14 Q. So your responsibilities at
15 Siena Marble it now includes accounts
16 payable; is that right?

17 A. Yes.

18 Q. When you said checking bank
19 statements, what do you mean by that?

20 A. Well, every day I have to check
21 the balance. I go into the computer and put
22 the information and make sure that the
23 checks are coming in. That's what I'm
24 referring to.

25 Q. In your accounting courses you

Page 77

1 L. Guzman

2 learned about accounts payable; is that
3 right?

4 A. Yes.

5 Q. You also learned about accounts
6 receivable; is that right?

7 A. Yes.

8 Q. You know that there is an
9 accounts receivable?

10 A. Yes.

11 Q. And you know that in accounts
12 receivable, the situation of what's called
13 bad debt; is that right?

14 A. Is that like debts that you
15 can't collect?

16 Q. Yes.

17 A. Yes.

18 Q. You're familiar with that
19 happening?

20 A. Yes.

21 Q. It's not necessarily only debts
22 that you can't collect, but debts that are
23 difficult to collect; is that right?

24 A. Yes.

25 Q. You're familiar with the concept

Page 78

1 L. Guzman
 2 of selling debt from one company to another
 3 or factor?
 4 MR. KESHAVARZ: Objection to
 5 the form of the question.
 6 A. I know, but it's not like I'm
 7 familiar with it.
 8 Q. But you have learned about it,
 9 even if you haven't had experience with it
 10 personally?
 11 MR. KESHAVARZ: Objection of
 12 form.
 13 A. I know the theory, but I was
 14 never in the area.
 15 Q. What do you understand the
 16 theory to be?
 17 A. For what?
 18 Q. For how a company might sell its
 19 debt to another company, so that second
 20 company would try to collect it.
 21 A. Yes, it could be done. It's
 22 legal.
 23 Q. Now, when you met your husband
 24 Mr. Guzman, that was in 2007; is that right?
 25 A. Yes.

Page 80

1 L. Guzman
 2 time, was it at the same C-Town chain of
 3 stores?
 4 A. Yes. That's where I met him.
 5 Q. What was his job then?
 6 A. Grocery manager or assistant
 7 grocery manager. I don't remember that
 8 exactly.
 9 Q. Did he own any store apart from
 10 working at the Sea Market?
 11 MR. KESHAVARZ: Objection to
 12 the form of the question.
 13 A. My husband?
 14 Q. Yes.
 15 A. No.
 16 Q. Were you aware of him having
 17 owned a store since 2001 up to a certain
 18 point?
 19 A. Yes.
 20 Q. Where was that store located?
 21 MR. KESHAVARZ: Objection of
 22 form.
 23 A. I don't remember the exact
 24 address, but it was in the Bronx near where
 25 he lived.

Page 79

1 L. Guzman
 2 Q. Where was he living at that
 3 time?
 4 A. In the Bronx.
 5 Q. Do you know where?
 6 A. No, I don't remember the
 7 address.
 8 Q. Do you remember the street?
 9 A. I think it was 163rd Street.
 10 Q. Do you remember the time of year
 11 or the date when you met him?
 12 A. It was March, April, March,
 13 April; that's the fall right?
 14 Q. In the United States we consider
 15 it the spring.
 16 A. March and April is the fall,
 17 correct.
 18 Q. Well, I'm not an expert witness,
 19 but I understand that the seasons are
 20 reversed.
 21 A. I just wanted to think about it.
 22 Q. I just want to find out, was it
 23 March or April?
 24 A. Yes.
 25 Q. Where was he working at the

Page 81

1 L. Guzman
 2 Q. Did you ever visit that store?
 3 A. No, never.
 4 Q. Did he tell you why he closed
 5 that store or stopped owning it?
 6 MR. KESHAVARZ: Objection of
 7 form.
 8 A. No. No, he didn't specify.
 9 Q. Did he tell you when he sold the
 10 store?
 11 MR. KESHAVARZ: Objection of
 12 form.
 13 A. He told me in 2004, I think.
 14 Q. Do you know who he sold it to?
 15 A. No, I have no ideas.
 16 Q. Do you know if your husband has
 17 any records from the time he owned that
 18 store?
 19 MR. KESHAVARZ: Objection of
 20 form.
 21 A. I wouldn't know, no.
 22 Q. When you pay invoices in your
 23 job at Siena Marble, do you ever have a
 24 circumstance where somebody asks you to pay
 25 an invoice that you don't believe Siena

1 L. Guzman
 2 Marble should pay?
 3 A. I don't remember a situation
 4 like that.
 5 Q. So you don't remember any
 6 situation, for example, if there was someone
 7 that made a mistake on an invoice that was
 8 sent to you?
 9 MR. KESHAVARZ: Objection of
 10 form.
 11 A. Yes.
 12 Q. What type of mistakes do you
 13 remember?
 14 A. Many types of errors. For
 15 example, they wouldn't give the discounts
 16 that were agreed on or the amount on the
 17 invoice isn't exactly the same amount that
 18 we received or we made a return and they
 19 didn't apply the credit. Situations like
 20 that.
 21 Q. You normally would call them up
 22 to straighten out the issue?
 23 A. The company?
 24 Q. Yes.
 25 A. Yes, immediately.

1 L. Guzman
 2 would recognize it. But on the occasions
 3 that they don't, would you ever contact
 4 them?
 5 A. First of all, if I don't
 6 recognize the invoice, if I don't recognize
 7 who it's coming from then the first thing I
 8 do is I go to the warehouse and ask them did
 9 you receive materials from this company.
 10 Q. And if they didn't?
 11 A. The last thing would be to call
 12 the company and let them know it's a
 13 mistake.
 14 Q. How many children do you and Mr.
 15 Guzman have together?
 16 A. One girl.
 17 Q. How old is she?
 18 A. Five.
 19 Q. So she was born in 2012?
 20 A. Correct.
 21 Q. Do you from time to time go on
 22 family trips in the car with Mr. Guzman?
 23 A. Yes.
 24 Q. How many children live with you
 25 in Valley Stream?

1 L. Guzman
 2 Q. Did you ever get an invoice from
 3 someone that you think you didn't owe the
 4 money to because it was sent to the wrong
 5 place?
 6 MR. KESHAVARZ: Objection of
 7 form.
 8 A. It's very rare that that happens
 9 when we get an invoice on paper, but it has
 10 "owned" when we receive it in the e-mail,
 11 but when I go to open up the e-mail I notice
 12 it has the wrong name.
 13 Q. What do you do in response?
 14 A. Most of the times the person
 15 that sends the e-mail realizes their mistake
 16 about ten or 15 minutes later, and they'll
 17 send an e-mail to apologize, like, I'm sorry
 18 or my mistake.
 19 Q. And if not. If they don't
 20 recognize their mistake?
 21 A. They can't not recognize it
 22 because when I open the e-mail I immediately
 23 see where it should say Siena Marble it has
 24 another name of another tile store.
 25 Q. You said most of the times they

1 L. Guzman
 2 A. Only the five-year-old.
 3 Q. When you have been taking those
 4 car trips together with your husband and
 5 your daughter in the last two years has Mr.
 6 Guzman driven the car?
 7 A. Sometimes he drives, sometimes I
 8 drive.
 9 Q. Are there concerns that you
 10 would have with him driving for your
 11 daughter's safety?
 12 A. No.
 13 Q. Not ever, right?
 14 A. No.
 15 Q. Have you ever been deposed
 16 before in a deposition?
 17 MR. KESHAVARZ: Objection of
 18 form.
 19 A. I don't understand the question.
 20 Q. What we're doing today is what
 21 we call a deposition, so that lawyers have
 22 an opportunity outside of court to ask
 23 questions of a witness with a Court Reporter
 24 present.
 25 Have you ever been involved in a

Page 86

1 L. Guzman
2 deposition as a witness?
3 A. No.
4 Q. Have you ever been involved in a
5 lawsuit in the United States?
6 A. No.
7 Q. Has your husband ever been
8 involved in any lawsuit as a party?
9 MR. KESHAVARZ: Objection, but
10 she can answer.
11 A. I don't remember.
12 Q. So you don't remember if he's
13 been sued by anybody other than the lawsuits
14 that we're talking about today?
15 MR. KESHAVARZ: Objection of
16 form.
17 A. I don't think so.
18 Q. Your husband had some back
19 surgery in connection with the car accident,
20 correct?
21 A. Yes.
22 Q. And where was he treated for
23 that?
24 A. What is this hospital called;
25 it's not like he received treatment there,

Page 87

1 L. Guzman
2 but he underwent surgery.
3 Q. Right. So where was the
4 surgery?
5 A. The name of the hospital is --
6 it's a hospital in Manhattan, it will come
7 to me.
8 Q. That's okay. That's fine.
9 Did your husband file a lawsuit
10 in connection with that car accident?
11 A. Yes.
12 Q. And has that lawsuit been
13 concluded?
14 A. Can you ask me again. What do
15 you mean by that?
16 Q. Did it end, did it go to a
17 judgment, did it settle, is it finished?
18 A. Yes, yes.
19 Q. How did it finish?
20 A. I think they reached a
21 settlement. I don't know. I don't know the
22 legal term. I don't want to get involved
23 with that, but I think they agreed on
24 something in front of the Judge.
25 Q. And a payment was made at the

Page 88

1 L. Guzman
2 conclusion of the lawsuit?
3 A. Yes.
4 Q. How much was that?
5 A. I don't know.
6 Q. Was more than \$100,000?
7 A. No.
8 Q. Was it less than \$50,000?
9 A. I don't remember the amount, but
10 it wasn't so large.
11 Q. Had you already taken the course
12 on personal taxes by 2010?
13 A. No.
14 Q. When did you take the course on
15 personal taxes?
16 A. Toward the end of 2011.
17 Q. Who prepared your income tax
18 filings for the tax year 2016?
19 A. H&R Block.
20 Q. Did you file a joint return with
21 your husband or separate returns?
22 A. Joint.
23 Q. For the tax year of 2015, did
24 you also use H&R Block?
25 A. 2016?

Page 89

1 L. Guzman
2 Q. I think we already asked in
3 2016. So now I'm asking in 2015.
4 For the calendar year 2015 who
5 prepared your taxes?
6 A. I did it with the H&R program.
7 Q. Did you file your taxes for 2015
8 separately or jointly with Jose Guzman?
9 A. Jointly.
10 Q. In connection with this lawsuit,
11 did you sign an engagement letter retaining
12 Mr. Keshavarz?
13 MR. KESHAVARZ: Objection to
14 the form.
15 A. No.
16 Q. Is there any document that you
17 signed that retained Mr. Keshavarz to be
18 your lawyer?
19 MR. KESHAVARZ: Objection of
20 form.
21 A. I would have to look at the
22 papers. I don't know what the form looks
23 like.
24 Q. But do you know whether your
25 husband signed any papers assigning Mr.

Page 90

1 L. Guzman
2 Keshavarz as his lawyer?
3 MR. KESHAVARZ: Objection of
4 form.

5 A. I don't know.

6 Q. This lawsuit was filed on behalf
7 of Jose Guzman, right?

8 MR. KESHAVARZ: Objection of
9 form.

10 A. Yes.

11 Q. And Mr. Keshavarz is your
12 husband's lawyer, right?

13 A. Yes.

14 Q. Do you remember yourself
15 personally retaining Mr. Keshavarz to be
16 your personal lawyer in connection with this
17 lawsuit?

18 MR. KESHAVARZ: Objection to
19 the form of the question.

20 You may answer.

21 A. Well, I'm the one who found him
22 in the computer, when we were looking for an
23 attorney to represent us.

24 Q. But is it your understanding
25 that Mr. Keshavarz is representing only your

Page 91

1 L. Guzman
2 husband or you as well?

3 MR. KESHAVARZ: Objection to
4 the form.

5 You can answer.

6 THE INTERPRETER: Can you repeat
7 the question, I got lost.

8 MR. LICHTMAN: Sure. Read back
9 the question.

10 [The requested portion of the
11 record was read back by the
12 reporter.]

13 MR. KESHAVARZ: Objection of
14 form.

15 A. Both.

16 Q. Let's get back to your husband's
17 court history.

18 So your husband has worked at
19 Fine Fare and the related stores now for how
20 long?

21 A. Well, before I met him he had
22 already worked there.

23 Q. So let's talk about the time
24 before working for Siena Marble. He had
25 already been working as a manager for those

Page 92

1 L. Guzman
2 Fine Fare stores for some time; is that
3 right?

4 MR. KESHAVARZ: Objection of
5 form.

6 A. Yes.

7 Q. Approximately what years were
8 those?

9 MR. KESHAVARZ: Objection of
10 form.

11 A. In 2007. And then he told me
12 about the past, but I don't know the dates.
13 He told me about the past dates, but I don't
14 know when he worked there but I know he
15 already worked there.

16 Q. Let's just talk about the time
17 that you knew him, so 2007 and after.

18 He was already an assistant
19 manager or a manager when you met him,
20 right?

21 A. Yes.

22 Q. About how many hours a week was
23 he working then?

24 A. Well, usually at the
25 supermarkets you have a schedule, but if

Page 93

1 L. Guzman
2 something happens you have to stay and solve
3 it, but in general it's nine hours.

4 Q. Was that six days a week?

5 A. Yes.

6 Q. What were his responsibilities
7 at that time?

8 MR. KESHAVARZ: Objection of
9 form.

10 A. Number one, he had the keys so
11 you had to open or close the store. Place
12 all the grocery orders, to make sure that
13 all the departments place the orders for
14 their departments, create the schedule,
15 whether it's dealing with the cashiers, the
16 front cashiers.

17 For example, if a customer comes
18 in and complains about the price of
19 something, or if the price isn't correct so
20 he deals with customer service.

21 Q. And he deals with hiring and
22 firing employees?

23 A. No.

24 Q. Was that job stressful for him
25 at the time?

1 L. Guzman
 2 MR. KESHAVARZ: Objection to
 3 the form of the question.
 4 A. Like every job. There are times
 5 that you can be relaxed, but there are other
 6 times when you have to be on, like, how do
 7 you say, it keeps the battery going.
 8 Q. Is his job at this time the same
 9 as it was then --
 10 MR. KESHAVARZ: Objection to
 11 the form.
 12 You can answer.
 13 Q. -- or his responsibilities?
 14 MR. KESHAVARZ: Objection of
 15 form.
 16 A. I believe that as they started
 17 knowing him more, they started giving him
 18 more responsibilities.
 19 Q. How do you understand his
 20 performances at work now?
 21 MR. KESHAVARZ: Objection of
 22 form.
 23 A. I consider that it's really very
 24 good.
 25 Q. Is that your understanding from

1 L. Guzman
 2 what he tells you also?
 3 A. It's my understanding because I
 4 know the business, and there really isn't
 5 space to make errors. Either you're good or
 6 what are you doing here.
 7 Q. Has your husband since his back
 8 operation been taking any medications?
 9 MR. KESHAVARZ: Objection to
 10 form.
 11 A. No.
 12 Q. Has he taken any medications for
 13 any reason that you know of in 2017?
 14 MR. KESHAVARZ: Objection of
 15 form.
 16 A. No.
 17 Q. By that I mean either
 18 over-the-counter medicine or prescription
 19 medicine.
 20 MR. KESHAVARZ: Objection of
 21 form.
 22 A. Maybe not Tylenol, he likes
 23 Aleve.
 24 Q. How about in 2016, did he take
 25 any over-the-counter or prescription

1 L. Guzman
 2 medications?
 3 A. No.
 4 Q. And in 2015?
 5 A. No.
 6 Q. From time to time, did your
 7 husband see a doctor in the last three
 8 years?
 9 MR. KESHAVARZ: Objection of
 10 form.
 11 A. Every year he sees his primary
 12 doctor.
 13 Q. Who is his primary doctor?
 14 A. The same one as mine. Let me
 15 look at the name. If you would like the
 16 name.
 17 MR. KESHAVARZ: If you remember,
 18 you can testify.
 19 A. Daniel Sackolik.
 20 Q. Can you spell the last name?
 21 A. S-A-C-K-O-L-I-K.
 22 Q. He's your doctor as well?
 23 A. Yes.
 24 Q. Where is he located?
 25 A. Hewlett, New York. It's very

1 L. Guzman
 2 close to Valley Stream. Broadway Avenue.
 3 Q. Do you know the number?
 4 A. No.
 5 Q. It's not really Broadway Avenue
 6 is it; it's really just Broadway?
 7 A. No, it's Broadway Avenue. I
 8 think it's avenue.
 9 Q. Does he have a specialty or is
 10 he just a general practitioner?
 11 A. General.
 12 Q. Has he gone to see Dr. Sackolik
 13 this year?
 14 A. Yes.
 15 Q. When was that?
 16 A. At the beginning of the year,
 17 because he was supposed to go and he kept
 18 postponing it.
 19 Q. So he went in January 27th?
 20 A. Yes.
 21 Q. For a general check-up?
 22 MR. KESHAVARZ: Objection to
 23 form.
 24 Q. Do you know if he had any
 25 complaints at that time that he told you he

1 L. Guzman
 2 wanted to raise with the doctor?
 3 A. No, he always goes and he's
 4 scared that his cholesterol is going to be
 5 high.
 6 Q. Did he have any other complaints
 7 that you know of in January 2017 that he
 8 would relay to his doctor?
 9 MR. KESHAVARZ: Objection of
 10 form.
 11 A. That he was embarrassed, but he
 12 felt that he needed to wear glasses.
 13 Q. In 2016 did he go to Dr.
 14 Sackolik?
 15 A. Yes.
 16 Q. When was that?
 17 A. I can't tell you the date, but
 18 my estimate is a year before the one he
 19 went, too, because he receives a letter that
 20 reminds him that it's time to go.
 21 Q. The letter is from Dr.
 22 Sackolik's office?
 23 A. It's a clinic, and they have a
 24 lot of different doctors and specialties.
 25 So we receive the letter from the clinic,

1 L. Guzman
 2 to leave the TV on, and I have to stay up to
 3 make sure I turn the TV off.
 4 Q. He said that a lot of it is
 5 because of this case?
 6 A. All of it because I've never
 7 seen him like this in the past.
 8 Q. When you say this case, you mean
 9 the case that he is bringing now against the
 10 people who are in this case?
 11 MR. KESHAVARZ: Objection of
 12 form.
 13 A. No. I'm referring to ever since
 14 the day that his employer received this
 15 letter.
 16 Q. Did he explain to you why he's
 17 worried about that case from his employer
 18 sending the letter?
 19 A. The main thing is because of the
 20 lies of the fraud that they did to start
 21 this case.
 22 They created a case where they
 23 said they had given him the Court papers by
 24 hand, and that's not true and he can't
 25 believe how these people could lie so

1 L. Guzman
 2 but it mentions this doctor.
 3 Q. Does your husband take any
 4 medication for cholesterol?
 5 MR. KESHAVARZ: Objection of
 6 form.
 7 A. Not now.
 8 Q. Did he before?
 9 A. The doctor gave them to him at
 10 some point, but he didn't like taking them,
 11 but then when he went back everything was
 12 fine.
 13 Q. Has your husband had any problem
 14 with sleep?
 15 MR. KESHAVARZ: Objection to
 16 the form.
 17 A. No.
 18 Q. In the last year, has your
 19 husband had any problem with sleep?
 20 A. Yes.
 21 Q. What was that problem?
 22 A. He tosses and is turning a lot
 23 at night. He tells me he's very worried, a
 24 lot of it is because of this case.
 25 When he does fall asleep he has

1 L. Guzman
 2 shamelessly.
 3 Q. Did you see any paper that says
 4 he was given this in his hands?
 5 MR. KESHAVARZ: Objection of
 6 form.
 7 A. Supposedly, they gave it to him
 8 to go to court and defend it.
 9 Q. Have you ever seen a piece of
 10 paper relating to the case that was brought
 11 against your husband that says that he was
 12 given the summons and complaint in his
 13 hands?
 14 MR. KESHAVARZ: Objection of
 15 form.
 16 A. No. It said that they had tried
 17 to give him the papers three times, and that
 18 they ended up giving them to a complete
 19 unknown person.
 20 So how is it possible that they
 21 can go with these papers and go to a judge
 22 and have him believe that he was notified of
 23 the situation.
 24 Q. Those papers say that his
 25 location was at 1304 Boston Road in the

Page 102

1 L. Guzman
 2 Bronx, as far as you remember?
 3 A. Yes.
 4 Q. Did you understand at that time
 5 that your husband had a store that he owned
 6 at 1304 Boston Road in the Bronx?
 7 MR. KESHAVARZ: Objection to
 8 the form.
 9 A. Not by that time. By that time
 10 he had already left that place a long time
 11 ago.
 12 Q. But he had one time worked at
 13 1304 Boston Road, correct?
 14 A. Yes, but not at the time they
 15 brought the letter.
 16 Q. Right. But he had previously
 17 worked at that address, right?
 18 A. Yes.
 19 Q. And he had actually owned the
 20 store at that address, correct?
 21 A. It's my understanding that he
 22 was, yes.
 23 Q. Has your husband ever seen a
 24 psychologist?
 25 MR. KESHAVARZ: Objection to

Page 104

1 L. Guzman
 2 record.
 3 Q. We had talked before the break
 4 about your husband's sleeping patterns.
 5 Has there been any other way in
 6 which you believe your husband has been
 7 affected in the last two years by the
 8 lawsuit that was started against him?
 9 MR. KESHAVARZ: Objection.
 10 A. Well, besides the fact that he
 11 can't sleep very well he also seems
 12 over-alert. Like when I try to talk to him
 13 about a problem, he thinks it's going to be
 14 about this case.
 15 Q. Anything else?
 16 MR. KESHAVARZ: Objection of
 17 form.
 18 A. Well, he always talks about how
 19 this case changed his life. How they tried
 20 to ruin his life with such a big lie,
 21 because if he had known about the existence
 22 of this case he would have gone to court to
 23 defend himself.
 24 He would have never allowed for
 25 a Judge to make a decision without him being

Page 103

1 L. Guzman
 2 form.
 3 A. No.
 4 Q. Has he ever been treated by a
 5 psychiatrist or a psychologist?
 6 MR. KESHAVARZ: Objection to
 7 form.
 8 A. No.
 9 Q. Does your husband go by any
 10 names other than Jose Guzman?
 11 A. No.
 12 Q. What's his mother's maiden name?
 13 A. Lara.
 14 Q. Does he ever go by that name
 15 Jose Guzman Lara?
 16 A. No.
 17 Q. Does he have any nickname?
 18 A. At home, no.
 19 Q. How about at work?
 20 A. No, I don't know.
 21 MR. LICHTMAN: Let's take a
 22 five-minute break. I might be done.
 23 (Whereupon, a short recess was
 24 taken.)
 25 MR. LICHTMAN: Back on the

Page 105

1 L. Guzman
 2 there, and having a chance to defend
 3 himself.
 4 So he's always remembering that.
 5 He's really not well at all. He wasn't like
 6 this before.
 7 Q. Has it affected him in any other
 8 way in the last two years?
 9 MR. KESHAVARZ: Objection.
 10 A. Well, he's always afraid that
 11 he's going to lose his job because there
 12 were so many days that he had to take off.
 13 The kind of work that he has
 14 they don't give us that many personal days.
 15 We don't have that kind of benefits where
 16 his boss would always ask how many days are
 17 you going to ask for; how long is this going
 18 to go for.
 19 So he's afraid that he's going
 20 to lose his job. This is not something, we
 21 cannot afford it.
 22 Q. The days off from the job, you
 23 understand it included him coming for the
 24 deposition this week?
 25 A. Of course, he's not going to get

Page 106

1 L. Guzman

2 paid for that.

3 Q. Now, when your husband talks
4 about the lawsuit and him wanting to have
5 been notified about the lawsuit, does he
6 also tell you that had he been notified he
7 would have won the case?

8 MR. KESHAVARZ: Objection of
9 form.

10 A. Of course, because he never, he
11 affirms that he never opened an account with
12 U.S.A. First Bank.

13 Q. Had he been notified of the
14 lawsuit originally, has he said to you that
15 he would have won because he never owed that
16 debt?

17 MR. KESHAVARZ: Objection of
18 form.

19 A. Exactly that he would have
20 appeared in court the day of the
21 appointment, and he would have said I do not
22 have that debt. I do not know that bank. I
23 do not have an account with them. And he
24 would have won because that was the truth of
25 it.

Page 108

1 L. Guzman

2 week?

3 A. No.

4 Q. Do you know why you did not send
5 a copy of the statements of Exhibit 19 to
6 anyone before within the last week?

7 A. I forgot that he had this
8 account because it's a very new account.
9 Jose also did not remind me, and I just
10 forgot.

11 The other reason is that we
12 didn't have it set up online yet, so we
13 always had to wait for it to come in the
14 mail in paper. And when the mail comes in
15 Jose grabs his letters, and I grab mine. He
16 grabs them and places them in the drawer and
17 I forgot but it wasn't because of anything.
18 I wasn't trying to hide anything.

19 Q. Do you remember the testimony
20 before about an issue about Mr. Guzman
21 driving a truck at Siena?

22 A. Yes.

23 Q. What was the issue about him
24 driving the truck?

25 MR. LICHTMAN: Objection of

Page 107

1 L. Guzman

2 MR. LICHTMAN: That's it. I
3 have nothing further.

4 MR. KESHAVARZ: I have a few
5 follow-up questions.

6 EXAMINATION

7 BY MR. KESHAVARZ:

8 Q. I want to go back to Exhibit
9 Number 10, the Citibank bank account that
10 was opened up in the name of Jose Guzman was
11 opened up in November 2016, is that about
12 right, which is Exhibit 19 in this case, and
13 it's Exhibit 10 of the deposition of Mr.
14 Guzman?

15 MR. GROSSMAN: Objection to the
16 form of the question.

17 Q. Did you ever e-mail Exhibit 19
18 to anyone?

19 A. Yes.

20 Q. When did you do that
21 approximately?

22 A. Less than a week ago.

23 Q. Did you ever give a copy of the
24 bank statements that are Exhibit 19 to
25 anyone prior to e-mailing them in the last

Page 109

1 L. Guzman

2 form.

3 A. He was so frustrated by this
4 case. He couldn't understand how it was
5 possible that people could ruin his life
6 like that way just lying. Lying, like
7 saying that they delivered the letter, when
8 they didn't deliver it.

9 And to create such a case to
10 make the Judge believe that they have all
11 the proof to win a case when someone owes
12 money.

13 He was so frustrated by that,
14 and the material that he carries in that
15 truck is so delicate that he was afraid of
16 having an accident.

17 Q. Now, there is a discussion about
18 whether you felt safe about Mr. Guzman
19 driving you in the car with your daughter,
20 and I think you said you felt safe about him
21 driving the car?

22 A. Yes, because it's very different
23 to drive a car than it is to drive a truck
24 that is full of all that material that's so
25 expensive.

Page 110

1 L. Guzman

2 Q. In what other way other than the
3 price of the marble, did he express to you
4 about why he was concerned about driving the
5 truck?

6 A. He had to remain very focussed,
7 and sometimes his mind would just wander,
8 thinking how am I going to solve this
9 problem. How many times do I have to appear
10 in court. I have to prove that I am
11 innocent. That I didn't open this account.
12 All of this had him worried.

13 Q. What did he do, if anything,
14 about driving the truck?

15 A. He started thinking about
16 finding another job.

17 Q. Do you know why?

18 A. Because, for example, this type
19 of truck when it's loaded with this type of
20 material, you have to drive slowly-slowly,
21 you have to stop very slowly.

22 Many times the cars behind him
23 would honk at him asking him to drive
24 faster, and he was worried about that, and
25 he thought no, no for me to keep a clear

Page 111

1 L. Guzman

2 mind to think of a way to solve my problem,
3 I need to find another job.

4 Q. Is that what he did?

5 A. Yes.

6 Q. How long after you found out
7 that L.R. Credit, and Mel Harris were trying
8 to garnish his wages how long was that?

9 MR. GROSSMAN: Objection to
10 form.

11 A. I don't understand the question.

12 Q. At some point Mr. Guzman found
13 out his employer got a copy of the letter
14 that is Exhibit 16; is that right?

15 A. Yes.

16 Q. What concerns, if any, did he
17 tell you arose from getting Exhibit 16?

18 MR. LICHTMAN: Objection of
19 form.

20 A. He started to get concerned
21 about all the times he had to go to court to
22 find the records; then to go present the
23 papers to the Judge and then go to the
24 hearing; then to go to Claro to ask for
25 help.

Page 112

1 L. Guzman

2 He was saying at some point his
3 boss was going to come and say, you know
4 what, take all the days off you need.

5 Q. What do you mean by that?

6 A. That he was dismissed.

7 Q. Let me ask a more specific
8 question. Do you know about how long
9 between when Mr. Guzman's employer got
10 Exhibit 16, and when Mr. Guzman left his
11 job? Do you know approximately how long
12 that was?

13 A. Yes. This was in the summer,
14 2015, and he left his job from Siena Marble
15 to go to work at AC Food in March 2016, so
16 it must have been seven months.

17 MR. LICHTMAN: Let the record
18 show the witness is asking counsel
19 whether her answer is correct.

20 Q. There is no correct answer or
21 incorrect answer. All you have to do is
22 listen to the question and if you don't know
23 the answer, just say that.

24 A. I want to clarify that when I
25 say an approximate I don't know the time,

Page 113

1 L. Guzman

2 that it's just approximate.

3 MR. LICHTMAN: Move to strike.

4 Q. Let me ask the question, again,
5 legal reasons. You don't have to worry
6 about it.

7 Do you remember one way or
8 another how much time passed between when
9 Mr. Guzman got the court letter, that's
10 Exhibit 16, and when he left working at
11 Siena?

12 MR. LICHTMAN: Objection, asked
13 and answered.

14 A. No, I don't know.

15 Q. Let's go back to the truck.

16 What is the difference between
17 driving the truck and driving your family
18 car?

19 A. The family car is a small car.
20 We're not carrying any material. It's not
21 loaded with anything. You have full
22 visibility in a car.

23 In a truck you can't look back.
24 You can't see back. It has mirrors, and
25 added to that you have to drive slowly; you

Page 114

1 L. Guzman
 2 have to drive a specific way so that the
 3 merchandise doesn't slide.
 4 Q. After Mr. Guzman got the letter
 5 of Exhibit 16, did you feel safe driving in
 6 the truck with him?
 7 MR. LICHTMAN: Objection to
 8 form.
 9 MR. GROSSMAN: Objection to
 10 form.
 11 A. I wouldn't know because I never
 12 got in the truck with him.
 13 Q. So in a nutshell, what was the
 14 reason you felt safe driving with him in
 15 your family car, even though Mr. Guzman
 16 expressed the concerns he did about driving
 17 the truck?
 18 MR. GROSSMAN: Objection to
 19 form.
 20 A. Because many times we're in the
 21 car and he's driving and he's just very,
 22 very good. He's a good driver.
 23 Q. And is the size of the vehicle
 24 one of the seasons why you feel safe --
 25 MR. LICHTMAN: Objection of

Page 115

1 L. Guzman
 2 form.
 3 MR. GROSSMAN: Objection of
 4 form.
 5 Q. -- as opposed to how you feel in
 6 the truck?
 7 Mr. GROSSMAN: Objection to
 8 form.
 9 A. Yes.
 10 Q. There's a point in time that
 11 both you and Mr. Guzman saw the letter to
 12 the employer that's Exhibit 16; is that
 13 correct?
 14 A. Yes.
 15 Q. Now, when the two of you got
 16 this letter, at that point in time did you
 17 know who the debt collector was claiming the
 18 original credit card was with?
 19 MR. GROSSMAN: Objection of
 20 form.
 21 A. That's exactly what the headache
 22 was. We didn't know what it was. The
 23 financial institution was unknown, the one
 24 he had the debt with.
 25 Q. Okay. You talked before about

Page 116

1 L. Guzman
 2 going on the internet after you got
 3 Exhibit 16; do you remember that?
 4 A. Yes.
 5 Q. Which names, if any, that are in
 6 Exhibit 16 did you search for?
 7 A. My apologies. L.R. Credit 13
 8 and Mr. Mel Harris.
 9 Q. What did you find in that
 10 search?
 11 A. Apologies again, but everything
 12 was really bad.
 13 Q. You don't have to apologize.
 14 What did you find out when you
 15 searched for L.R. Credit 13 and Mel Harris
 16 on the internet, after you got it?
 17 MR. GROSSMAN: Objection of
 18 form.
 19 MR. LICHTMAN: Objection of
 20 form.
 21 A. I found that L.R. Credit 13 and
 22 Mel Harris, they do a lot of fictitious
 23 things or send fraud and a lot of people
 24 have actually countersued them, because they
 25 also start by saying they send these letters

Page 117

1 L. Guzman
 2 to the people when they really don't.
 3 Q. And by the letters to the
 4 people, what do you mean?
 5 A. I think it's called a subpoena,
 6 when they inform them they have a case.
 7 Q. What was the relationship
 8 between what you found out on the internet
 9 about L.R. Credit and Mel Harris; what was
 10 that relationship like to you, what happened
 11 to your husband?
 12 MR. GROSSMAN: Objection of
 13 form.
 14 MR. LICHTMAN: Objection of
 15 form.
 16 A. He experienced the exact same
 17 things that all these people experience in
 18 the internet. They said they commit a lot
 19 of fraud.
 20 I don't know how they even make
 21 this legal. They commit fraud by saying
 22 they sent this to the people, and they
 23 really don't.
 24 Then they go to the Judge and
 25 say you see this person is in debt and they

Page 118

1 L. Guzman
2 didn't even come, and then the Judge says,
3 okay, the verdict is in their favor.

4 So when we read that, my husband
5 says is this possible that this happened to
6 me. I never had any problems.

7 You always think, well, it
8 happens to other people who knows why, but
9 then it happens to you. And you think is it
10 possible that this can happen to me. I have
11 to get help to defend myself.

12 Q. Now you used the phrase
13 "subpoena"; do you know if that's also a
14 lawsuit if you know?

15 MR. LICHTMAN: Objection of
16 form.

17 MR. GROSSMAN: Objection of
18 form.

19 Q. When I use that word, I'm
20 referring to the fact that they have to take
21 the case to the person to notify them that
22 there is a case? What do you mean when you
23 say case?

24 A. When these people L.R. Credit
25 and Mel Harris create a case, a ghost case,

Page 119

1 L. Guzman
2 but they have to notify the person and say,
3 look, you have this case.

4 MR. KESHAVARZ: Off the record.
5 (Whereupon, an off-the-record
6 discussion was held.)

7 MR. KESHAVARZ: Mark this
8 Exhibit 20.

9 (Whereupon, Defendants'
10 Exhibit 20, consumer credit
11 transaction was hereby marked for
12 identification, as of this date.)

13 (Whereupon, Defendants'
14 Exhibit 21, summons and complaint in
15 the collection lawsuit was hereby
16 marked for identification, as of this
17 date.)

18 Q. Before our break you said there
19 was something you want to get off your
20 chest; what was that?

21 MR. LICHTMAN: Objection of
22 form.

23 A. I just wanted to say as a
24 personal comment, you can go and tell your
25 bosses or whoever you represent if they have

Page 120

1 L. Guzman
2 any idea of how they can ruin a person with
3 a lie like this.

4 MR. KESHAVARZ: Do you want to
5 take a quick break?

6 THE WITNESS: Yes.

7 (Whereupon, a short recess was
8 taken.)

9 MR. KESHAVARZ: Back on the
10 record.

11 Q. So I'm showing you what is
12 called Exhibit 21, which is the summons and
13 complaint in the collection lawsuit.

14 Look at the first page. The
15 document, the summons. Is there anything on
16 that document that makes you want to clarify
17 your testimony?

18 MR. GROSSMAN: Objection of
19 form.

20 MR. LICHTMAN: Objection of
21 form.

22 Q. Go ahead, you can answer.

23 A. What I'm saying is that he
24 wasn't given the letter or the papers in
25 this case I'm referring to this, this thing

Page 121

1 L. Guzman
2 here. It's very technical.

3 Q. You were putting a circle around
4 something, what was that?

5 A. This word here "summons."

6 Q. Was summons the word you were
7 thinking about when you said subpoena?

8 MR. LICHTMAN: Objection of
9 form.

10 MR. GROSSMAN: Objection of
11 form.

12 A. Yes.

13 Q. Now, let me show you what's been
14 marked as Exhibit Number 20.

15 Take a chance to look at it and
16 look at the second page and let me know when
17 you're done.

18 A. Okay.

19 Q. Who is that letter addressed to?

20 A. Jose Guzman.

21 Q. Did Mr. Guzman get a copy of
22 this letter in the mail?

23 A. Yes.

24 Q. Okay.

25 MR. LICHTMAN: What is the date

<p style="text-align: right;">Page 122</p> <p>1 L. Guzman 2 on this letter? 3 THE WITNESS: August 18, 2015. 4 Q. Let me just read this into the 5 record. 6 "Dear Jose Guzman: Our office 7 has decided not to go forward with 8 the scheduled traverse hearings. 9 Enclosed please find three duplicate 10 stipulations to vacate the judgment 11 and discontinue action. 12 "Please review and execute two 13 of the stipulations and keep an 14 additional copy for your record. 15 Please transmit a fully executed copy 16 to Rosemary Orkina, her facsimile 17 number is 212-660-1025 as soon as 18 possible." 19 Signed, Rosemary Orkina, Mel 20 Harris and Associates. 21 MR. GROSSMAN: Motion to 22 strike. 23 MR. LICHTMAN: Motion to strike. 24 MR. KESHAVARZ: The reason to 25 strike was?</p>	<p style="text-align: right;">Page 123</p> <p>1 L. Guzman 2 MR. GROSSMAN: There was no 3 question. She reads English, so I 4 don't understand why you're reading 5 this document. 6 Q. Did I read this correctly, 7 ma'am? 8 A. Yes. 9 Q. So I'm showing you the last page 10 of Exhibit 17, that's entitled "Affidavit 11 and Support and Order to Show Cause and 12 Vacate Judgment and Default Judgment and To 13 Dismiss For Lack of Personal Jurisdiction, 14 No File of It." 15 Did I read that correctly? 16 A. Yes. 17 MR. GROSSMAN: Objection of 18 form. 19 MR. LICHTMAN: Objection of 20 form. 21 Q. Going to the last page, what is 22 the date that the document is signed? 23 A. July 23, 2015. 24 Q. Compare that to the date of the 25 letter that Mel Harris sent to you which is</p>
<p style="text-align: right;">Page 124</p> <p>1 L. Guzman 2 Exhibit 20? 3 A. August 18, 2015. 4 Q. What did you and Mr. Guzman do, 5 if anything, after receiving the letter 6 that's Exhibit 20? 7 MR. LICHTMAN: Objection of 8 form. 9 A. When we received it and read it, 10 we both thought this is too good to be true. 11 There must be something. Jose told me these 12 people are such liars that may be they just 13 don't want me to appear at the traverse 14 hearings where I can defend myself. So they 15 can again tell it the Judge you see Jose 16 Guzman didn't show. That was the first 17 thing we thought. 18 The second thing is that we 19 didn't understand the paragraph in the 20 middle that says "vacate judgment and 21 discontinue action." We didn't know because 22 we're not attorneys the total implication of 23 discontinue action. 24 Q. Now earlier in the deposition, 25 opposing counsel asked you about the phrase</p>	<p style="text-align: right;">Page 125</p> <p>1 L. Guzman 2 "vacate judgment"; do you remember that? 3 A. Yes. 4 Q. Did you have an issue with the 5 translation of that phrase at that point? 6 MR. GROSSMAN: Objection of 7 form. 8 MR. LICHTMAN: Objection of 9 form. 10 A. Well, the translator's words 11 confused me a little bit. 12 Q. In what way? 13 A. That I'm not an attorney to 14 understand the terminology. So when it's 15 translated in a way that I could understand, 16 maybe it's not the same thing. 17 Q. In what way did you understand 18 it? What were the phrases used and how did 19 you understand that? 20 MR. LICHTMAN: Objection of 21 form. 22 MR. GROSSMAN: Objection of 23 form. 24 A. What I thought -- and I don't 25 know if I'm correct but it's what I</p>

Page 126

1 L. Guzman
2 thought -- I don't know if it's correct that
3 this word in Spanish sounds like a vacancy.
4 Vacancy in Spanish means open.

5 Q. Okay. So what did you do after
6 you got Exhibit 20. Did you see anyone
7 after you got Exhibit 20?

8 MR. LICHTMAN: Objection of
9 form.

10 MR. GROSSMAN: Objection of
11 form.

12 A. No, I didn't. Jose went to
13 court, and he went to Claro to show this to
14 him.

15 Q. What did Mr. Guzman tell you
16 happened after he went to see Claro?

17 A. They told him, no, don't sign
18 that because it's missing a clause. It says
19 here item 4 it says "Discontinued with
20 prejudice" and everything that goes after
21 that additionally all potential defenses.

22 THE INTERPRETER: Do I have to
23 read it in English?

24 MR. KESHAVARZ: You can read it
25 in Spanish and translate. Whatever

Page 127

1 L. Guzman

2 you feel more comfortable.

3 A. Well, this paragraph says that:

4 "Discontinue with prejudice
5 additionally any and all potential
6 defenses Defendant may have regarding
7 this matter, and any other claims
8 Defendant may have to date against
9 plaintiff or its counsel related to
10 this matter are hereby waived and
11 released."

12 Q. So when Mr. Guzman went to
13 Claro, did they explain to him whether he
14 should sign it, and if so, why or why not?

15 MR. LICHTMAN: Objection of
16 form.

17 MR. GROSSMAN: Objection of
18 form.

19 A. Well, of course, they explained
20 how this document could change with or
21 without this clause.

22 Q. Did they express any concerns,
23 and if so, what concerns about signing this
24 stipulation that was mailed to you that's
25 Exhibit 20?

Page 128

1 L. Guzman

2 MR. LICHTMAN: Objection of
3 form.

4 MR. GROSSMAN: Objection of
5 form.

6 A. They explained that this
7 document was in their favor, but that it
8 wouldn't benefit my husband.

9 Q. Did they say why?

10 MR. LICHTMAN: Objection of
11 form.

12 MR. GROSSMAN: Objection of
13 form.

14 A. Because with this letter it was
15 just discontinue action period. And with
16 this, now you have another opportunity open.

17 Q. So let's go back to what you
18 read on the internet. Has your husband
19 expressed any concerns to you about what
20 L.R. Credit might do?

21 MR. GROSSMAN: Objection of
22 form.

23 MR. LICHTMAN: Objection of
24 form.

25 A. Of course, because since we're

Page 129

1 L. Guzman

2 not attorneys and we see that people with a
3 license to practice can commit these frauds
4 then what's left for us. They can lie
5 again, they can create documents. We're
6 completely concerned.

7 Q. Has Mr. Guzman expressed a
8 continued concern, even though this lawyer
9 signed Exhibit 18, the stipulation?

10 MR. LICHTMAN: Objection of
11 form.

12 MR. GROSSMAN: Objection of
13 form.

14 A. My husband believes -- and I
15 don't know if it's right or not because I
16 I'm not an attorney -- but he thinks that if
17 these people who have a professional license
18 are not in prison that they're just free
19 like business people.

20 So if they can create these
21 lies, why can't they continue fabricating
22 lies and continue to harm us.

23 MR. GROSSMAN: Thank you, ma'am.
24 I'm done with questions. The other
25 attorneys might have follow up.

Page 130

1 L. Guzman
2 We'll find out.
3 MR. LICHTMAN: I have nothing
4 further.
5 MR. GROSSMAN: Thank you very
6 much.
7 THE WITNESS: All right. Thank
8 you.
9 (Time noted: 3:35 p.m.)

10
11
12 LAURA GUZMAN
13

14 Sworn and Subscribed

15 This ____ day of ____, 2017.

16
17 Notary Public
18
19
20
21
22
23
24
25

Page 132

1
2
3 **C E R T I F I C A T E**
4
5

6 STATE OF NEW YORK)
7 : ss.
8

9 COUNTY OF NEW YORK)
10

11 I, MARVA CLARKE, a Shorthand Reporter and
12 Notary Public within and for the State of New York,
13 do hereby certify:

14 That LAURA GUZMAN, the witness
15 whose deposition is hereinbefore set forth, was
16 sworn and that such deposition is a true record of
17 the testimony given by such witness.

18 I further certify that I am not related
19 to any of the parties to this action by blood or
20 marriage; and that I am in no way interested in the
21 outcome of this matter.

22 IN WITNESS WHEREOF, I have hereunto set
23 my hand this 21st day of June, 2017.
24

25 MARVA CLARKE

Page 131

1
2 ----- I N D E X -----
3 WITNESS EXAMINATION BY PAGE
4 Laura M. Comuzzi Guzman Mr. Grossman 5
5 Mr. Lichtman 59
6 Mr. Keshavarz 107
7 ----- EXHIBITS -----
8 DEFENDANTS' FOR ID.
9 Exhibit 16, document 18
10 Exhibit 17, affidavit and support of 26
11 order to show cause to vacate default
12 judgment
13 Exhibit 18, two-page document, second 33
14 page caption, "Stipulation to Vacate
15 Judgment and Discontinue Action,"
16 October 2, 2013
17 Exhibit 19, Citibank checking and 43
18 savings account statements of Jose
19 Guzman, opened in November 2016
20 Exhibit 20, consumer credit transaction
21 letter addressed to Jose Guzman, dated
22 August 18, 2015 119
23 Exhibit 21, summons and complaint in 119
24 the collection lawsuit
25

Page 133

1 **ERRATA SHEET**

2 Case Name:

3 Deposition Date:

4 Deponent:

5 Pg. No. Now Reads Should Read Reason

6	_____	_____	_____
7	_____	_____	_____
8	_____	_____	_____
9	_____	_____	_____
10	_____	_____	_____
11	_____	_____	_____
12	_____	_____	_____
13	_____	_____	_____
14	_____	_____	_____
15	_____	_____	_____
16	_____	_____	_____
17	_____	_____	_____
18	_____	_____	_____
19	_____	_____	_____
20	_____	_____	_____

21
22 _____
Signature of Deponent

23 SUBSCRIBED AND SWORN BEFORE ME

24 THIS ____ DAY OF ____, 2017.

25 (Notary Public) MY COMMISSION EXPIRES: _____

A				
A.C (1) 37:2 a.m (1) 1:21 able (4) 17:24 18:3 22:4 31:17 AC (1) 112:15 accept (1) 30:24 accepted (1) 34:16 accident (7) 16:6 40:20,25 41:8 86:19 87:10 109:16 account (22) 9:20 10:4,7 11:6,16 11:23 12:22 29:21 43:4,9 44:15 46:12 46:18 47:15 69:14 106:11,23 107:9 108:8,8 110:11 131:18 accountant (5) 8:23 62:4,13 75:8,10 accountants (1) 75:16 accounting (17) 8:15 63:10 65:15 67:25 68:7,7,21,24 69:2,10,12,13,14,15 69:21,23 76:25 accounts (12) 10:10,13,16,21,25 11:11 64:23 76:15 77:2,5,9,11 accurate (1) 66:10 accurately (1) 4:6 accusations (1) 39:5 accused (2) 38:11,21 action (11) 33:17 34:4 35:13 48:19,25 122:11 124:21,23 128:15 131:15 132:19 activity (1) 36:24 added (1) 113:25 additional (2) 70:2 122:14	additionally (2) 126:21 127:5 address (16) 4:24 6:18 9:16,18 32:24 33:4,6,8 61:12,16,19,20 79:7 80:24 102:17,20 addressed (3) 34:7 121:19 131:21 advanced (3) 68:24 69:14 70:9 affidavit (4) 25:23 26:3 123:10 131:10 affirms (1) 106:11 afford (1) 105:21 afraid (4) 17:18 105:10,19 109:15 afternoon (3) 25:14 59:8,9 against- (1) 1:7 age (1) 66:17 ago (3) 45:12 102:11 107:22 agreed (5) 3:3,8,12 82:16 87:23 agreement (1) 74:7 ahead (3) 49:24 54:18 120:22 Ahmad (4) 1:19 2:4,8 5:17 Aleve (1) 95:23 allowed (1) 104:24 American (1) 68:11 amount (4) 47:20 82:16,17 88:9 ANDINO (1) 1:12 angle (1) 50:23 annual (2) 12:24 14:7 answer (46) 6:8,8 9:25,25 29:18 30:7 32:2,4,7,14 43:22 44:3 47:18 48:3 49:5,19 50:4,8	50:11,16,21 51:18 51:21,24 52:10,13 53:3,5 54:2,7,16,22 55:13 56:11,25 57:17 58:14 86:10 90:20 91:5 94:12 112:19,20,21,23 120:22 answered (6) 15:4 27:16 47:17 52:23 58:5 113:13 answering (3) 55:15 57:5 66:4 answers (3) 4:9 24:13 52:2 anybody (1) 86:13 apart (1) 80:9 apologies (2) 116:7,11 apologize (2) 83:17 116:13 appear (5) 34:21,25 58:16 110:9 124:13 appearance (3) 31:2,11,12 APPEARANCES (1) 2:2 appeared (1) 106:20 applied (1) 72:9 apply (2) 28:16 82:19 appointment (2) 13:21 106:21 approached (1) 73:21 appropriate (5) 50:12,14 52:3 53:3,5 approximate (3) 14:6 112:25 113:2 approximately (7) 11:22 12:23 24:17 61:16 92:7 107:21 112:11 approximating (1) 13:9 April (4) 79:12,13,16,23 area (2) 74:3 78:14 Argentina (13) 61:4,6 62:3,5 63:4,12	63:14,16 64:5 65:16 65:18 66:12,15 arose (1) 111:17 arrived (1) 21:17 asked (18) 15:4 20:16 22:22 23:10 25:14 26:24 35:25 47:17 49:12 50:6,10 51:22 53:2 54:14,20 89:2 113:12 124:25 asking (19) 5:22 11:20 23:17 42:16,18 44:4 46:14 46:15,20 47:2 49:6 49:14 52:9 54:9 55:14 68:20 89:3 110:23 112:18 asks (2) 40:10 81:24 asleep (1) 99:25 assigning (1) 89:25 assistant (2) 80:6 92:18 Associates (2) 1:8 122:20 assume (1) 27:12 assumed (1) 20:10 assuming (1) 68:17 attend (2) 31:24 63:3 attention (3) 28:5 33:2 66:17 attorney (9) 5:8 18:16,18 19:5 20:3 34:16 90:23 125:13 129:16 attorney-client (1) 48:9 attorneys (7) 2:5,11,17 5:10,24 129:2,25 attornies (2) 34:20 124:22 auditing (4) 63:22 68:24 69:10,14 August (4) 60:7 122:3 124:3 131:22	avenue (7) 2:12 61:14,19 97:2,5 97:7,8 aware (2) 16:14 80:16 <hr/> B B-E-L-G-R-A-N-O ... 63:6 BA (2) 68:6,14 baby (1) 12:10 bachelor's (1) 63:9 back (30) 16:21 17:4,6 21:2 28:22,24 29:23,25 33:2 41:18 42:2,5 54:4 57:15,19 62:25 75:18 86:18 91:8,11 91:16 95:7 99:11 103:25 107:8 113:15,23,24 120:9 128:17 bad (2) 77:13 116:12 balance (1) 76:21 bank (20) 9:20 10:4 11:2,16 22:14 23:23 29:22 30:10 42:12 44:2,11 44:12,15 45:17 75:12 76:18 106:12 106:22 107:9,24 banking (1) 45:25 bathe (1) 13:25 battery (1) 94:7 began (3) 7:17 8:4 14:17 beginning (3) 9:11 67:15 97:16 behalf (2) 34:16 90:6 Belgrano (4) 63:5,8 64:2 65:14 believe (9) 17:9 26:7 33:20 81:25 94:16 100:25 101:22 104:6 109:10 believes (1)

129:14 believing (1) 47:23 benefit (1) 128:8 benefits (1) 105:15 best (1) 38:7 better (1) 13:13 big (1) 104:20 bills (2) 64:21,23 birth (1) 60:3 bit (1) 125:11 blamed (1) 37:24 blaming (1) 38:4 Block (4) 65:20 69:21 88:19,24 blood (1) 132:19 bono (4) 25:10,12 27:13 28:17 bookkeeper (4) 8:22 14:5 67:21,23 born (2) 61:3 84:19 boss (2) 105:16 112:3 bosses (1) 119:25 Boston (3) 101:25 102:6,13 bottom (2) 19:21 20:3 box (1) 29:5 break (4) 103:22 104:3 119:18 120:5 bringing (1) 100:9 Broadway (4) 97:2,5,6,7 Bronx (4) 79:4 80:24 102:2,6 Brooklyn (2) 1:20 2:7 brother (3) 71:25 72:10 73:9	brother's (1) 75:20 brother-in (1) 76:4 brought (6) 17:11,12 25:4 51:7 101:10 102:15 bus (1) 64:12 business (8) 12:15 64:17 65:12 69:16 72:16 73:16 95:4 129:19 <hr/> C <hr/> C (5) 4:2 37:6 59:16 132:3 132:3 C-O-M-U-Z-Z-I (1) 59:23 C-Town (1) 80:2 calender (1) 89:4 call (7) 20:9 22:21 38:25 39:2 82:21 84:11 85:21 called (10) 4:3 7:25 12:14 19:6 36:25 63:5 77:12 86:24 117:5 120:12 caption (3) 33:16 34:2 131:14 car (22) 39:8,10,14,18,20 40:7 40:25 41:8 84:22 85:4,6 86:19 87:10 109:19,21,23 113:18,19,19,22 114:15,21 card (2) 65:4 115:18 cards (1) 44:18 care (1) 55:24 career (1) 62:9 carries (1) 109:14 carrying (1) 113:20 cars (1) 110:22 cart (1) 42:13	case (46) 1:6 5:9 18:9,15 23:13 23:19,24,25 24:4,12 24:15 26:24 32:10 34:17 42:14 48:25 51:3,4 57:13 69:13 99:24 100:5,8,9,10 100:17,21,22 101:10 104:14,19 104:22 106:7 107:12 109:4,9,11 117:6 118:21,22,23 118:25,25 119:3 120:25 133:2 cashiers (2) 93:15,16 cause (4) 25:24 26:4 123:11 131:11 cease (1) 13:4 ceased (1) 12:4 center (1) 63:21 certain (2) 29:20 80:17 certification (1) 3:5 certify (2) 132:13,18 chain (1) 80:2 chance (2) 105:2 121:15 change (2) 13:25 127:20 changed (1) 104:19 changes (1) 54:25 charge (1) 64:22 Chase (4) 10:4 11:5,16 44:15 CHAVEZ (1) 2:24 check (4) 65:4 75:12,14 76:20 check-up (1) 97:21 checked (4) 24:6,7 29:6 37:25 checking (14) 10:4,6,9,15,20,24 11:6,10,16,23 43:3	43:9 76:18 131:17 checks (1) 76:23 chest (1) 119:20 children (3) 62:15 84:14,24 cholesterol (2) 98:4 99:4 choose (2) 68:23 71:4 circle (1) 121:3 circumstance (1) 81:24 Citibank (7) 10:7 43:3,9 46:12,18 107:9 131:17 claiming (1) 115:17 claims (1) 127:7 Clara (1) 34:20 clarify (2) 112:24 120:16 Clarke (4) 1:21 4:17 132:11,25 Claro (5) 27:18 111:24 126:13 126:16 127:13 classes (6) 67:10 69:5,6,23 70:2 70:5 clause (2) 126:18 127:21 clear (8) 19:11 23:2 34:7 42:16 46:14 52:8 56:8 110:25 client (1) 48:7 clinic (2) 98:23,25 close (2) 93:11 97:2 closed (2) 23:19 81:4 co-workers (1) 8:7 coaching (1) 51:19 colleagues (1) 27:16 collect (5) 75:13 77:15,22,23	78:20 collected (7) 42:12,18,19 43:19 44:2 45:17,25 collection (4) 64:23 119:15 120:13 131:24 collector (1) 115:17 College (1) 70:8 come (11) 8:24 12:3 21:2 32:24 43:18,25 46:10 87:6 108:13 112:3 118:2 comes (2) 93:17 108:14 comfortable (1) 127:2 coming (4) 5:5 76:23 84:7 105:23 comment (1) 119:24 commercial (1) 69:11 COMMISSION (1) 133:25 commit (3) 117:18,21 129:3 communication (1) 42:17 Community (1) 70:8 companies (1) 30:9 company (15) 8:16 13:16 15:2,15 27:13 64:11 65:7 75:17 78:2,18,19,20 82:23 84:9,12 compare (2) 51:14 123:24 comparing (1) 52:15 complains (2) 41:25 93:18 complaint (4) 101:12 119:14 120:13 131:23 complaints (2) 97:25 98:6 complete (2) 25:2 101:18 completely (1) 129:6 computer (7)
--	--	---	--	--

20:6 22:16 24:6,8 25:9 76:21 90:22 Comuzzi (7) 6:17 60:1 71:8,20,22 73:9 131:4 Comuzzi's (2) 74:17 76:4 concept (1) 77:25 concern (1) 129:8 concerned (5) 17:17 40:19 110:4 111:20 129:6 concerns (6) 85:9 111:16 114:16 127:22,23 128:19 concluded (1) 87:13 conclusion (1) 88:2 conditions (1) 13:14 confidential (2) 59:25 60:6 Confidential-L (1) 60:1 confirmed (1) 22:15 confused (1) 125:11 confusion (1) 17:21 connection (5) 42:13 86:19 87:10 89:10 90:16 consider (3) 72:21 79:14 94:23 construction (1) 64:13 consult (1) 74:5 consumer (2) 119:10 131:20 contact (2) 20:2 84:3 continue (6) 42:10 53:12,18 56:22 129:21,22 continued (3) 21:22 60:8 129:8 continuing (1) 19:12 conversation (1) 55:11 conversations (2)	73:8,13 copy (10) 17:10 22:4,23 24:23 107:23 108:5 111:13 121:21 122:14,15 corporate (1) 65:23 correct (27) 9:21 14:18 19:15,24 25:20 28:11,18 45:19 49:2 51:9 57:7 58:11,25 62:7 62:13 75:21 79:17 84:20 86:20 93:19 102:13,20 112:19 112:20 115:13 125:25 126:2 correctly (2) 123:6,15 costs (1) 69:15 counsel (9) 3:4 6:6 9:24 34:18 44:5,6 112:18 124:25 127:9 count (1) 64:14 countersued (1) 116:24 country (1) 62:9 COUNTY (1) 132:9 couple (2) 48:14,16 course (17) 24:16 30:18 34:13 35:12 38:25 40:22 65:21,25,25 69:20 72:6 88:11,14 105:25 106:10 127:19 128:25 courses (12) 65:14,21 68:13,18,20 68:23 69:2,3,12 70:12,13 76:25 court (27) 1:2,19 2:6 3:15 18:9 18:15 19:9 20:17,22 21:14 22:18 23:11 24:23 25:12 30:25 31:10 85:22,23 91:17 100:23 101:8 104:22 106:20 110:10 111:21	113:9 126:13 courthouse (2) 23:3,7 courts (1) 25:9 cover (1) 59:25 create (5) 93:14 109:9 118:25 129:5,20 created (1) 100:22 credit (21) 1:8 2:11 5:10 22:11 30:6,6 42:13 44:18 65:4 68:19 82:19 111:7 115:18 116:7 116:15,21 117:9 118:24 119:10 128:20 131:20 credits (1) 69:4 current (4) 4:24 6:18 9:16 61:20 currently (3) 6:21,23 10:10 customer (2) 93:17,20 cut (1) 53:10 <hr/> D <hr/> D (1) 131:2 dad (1) 66:16 damage (1) 38:11 Daniel (1) 96:19 date (20) 19:3 21:3,7,8 24:20 26:6 30:22,23 33:19 43:7 60:3 79:11 98:17 119:12,17 121:25 123:22,24 127:8 133:3 dated (3) 34:5 48:21 131:21 dates (3) 46:9 92:12,13 dating (1) 8:5 daughter (2) 85:5 109:19 daughter's (1)	85:11 daughters (1) 62:15 DAVID (1) 1:9 day (13) 20:16 22:18 25:12 31:8 37:20 42:10 44:25 76:20 100:14 106:20 130:14 132:23 133:23 days (7) 24:23 93:4 105:12,14 105:16,22 112:4 dealing (1) 93:15 deals (2) 93:20,21 Dear (1) 122:6 debit (1) 75:14 debt (9) 30:5 77:13 78:2,19 106:16,22 115:17 115:24 117:25 debts (3) 77:14,21,22 December (2) 9:4,11 decided (2) 36:23 122:7 decision (1) 104:25 decisions (2) 73:23,24 deemed (1) 59:24 default (7) 25:25 26:4 29:10 36:3 36:9 123:12 131:11 defend (7) 23:25 26:25 101:8 104:23 105:2 118:11 124:14 Defendant (3) 2:11 127:6,8 defendants (5) 1:13,17 2:17 5:9,15 Defendants' (7) 18:24 26:2 33:14 43:2 119:9,13 131:8 defenses (3) 28:11 126:21 127:6 define (1) 30:4	definitely (1) 30:11 degree (5) 63:7,9,11 68:14,19 delicate (2) 15:24 109:15 deliver (1) 109:8 delivered (1) 109:7 deliveries (1) 15:24 department (2) 8:16 63:22 departments (2) 93:13,14 Deponent (2) 133:4,21 deposed (1) 85:15 deposit (1) 46:12 deposited (2) 47:14,21 deposition (17) 1:16 3:6,13 19:14 26:8 33:22 43:12 48:12 85:16,21 86:2 105:24 107:13 124:24 132:15,16 133:3 describe (3) 27:3 41:17 50:22 described (1) 33:10 designate (1) 60:5 difference (1) 113:16 different (5) 46:4 50:23 68:22 98:24 109:22 difficult (1) 77:23 dinner (1) 73:20 direct (1) 74:11 directly (6) 71:2 74:11,12,14,24 76:7 directs (2) 6:7 9:24 disagree (1) 53:17 discontinue (10)
--	---	--	--	---

33:17 34:4 35:13 48:19 122:11 124:21,23 127:4 128:15 131:15 discontinued (2) 48:25 126:19 discounts (1) 82:15 discuss (1) 48:11 discussed (2) 48:22 49:8 discussion (2) 109:17 119:6 dismiss (2) 34:17 123:13 dismissed (2) 32:11 112:6 distributor (2) 12:17 13:16 DISTRICT (2) 1:2,3 doctor (10) 42:3,4 96:7,12,13,22 98:2,8 99:2,9 doctors (1) 98:24 document (37) 18:25 19:17 26:17,21 26:23 27:4,8,9,12 27:17,23,25 28:14 30:15 33:5,15,25 34:2,11,12,14,15 35:9,16 36:2,3 48:24 57:7 89:16 120:15,16 123:5,22 127:20 128:7 131:9 131:13 documents (6) 43:16,19 44:20 70:19 70:22 129:5 doing (5) 52:6 53:8 56:9 85:20 95:6 Dr (3) 97:12 98:13,21 drama (1) 19:19 draw (2) 28:5 33:2 drawer (1) 108:16 drive (14) 15:23 16:5 39:15,18 39:20 40:3,11 85:8 109:23,23 110:20	110:23 113:25 114:2 driven (1) 85:6 driver (2) 40:14 114:22 drives (6) 40:5,9,13,17,22 85:7 driving (13) 85:10 108:21,24 109:19,21 110:4,14 113:17,17 114:5,14 114:16,21 due (1) 20:7 duly (2) 4:4,16 duplicate (1) 122:9 <hr/> E E (4) 4:2 131:2 132:3,3 e-mail (6) 83:10,11,15,17,22 107:17 e-mailing (1) 107:25 earlier (1) 124:24 early (2) 13:21,25 economics (1) 69:10 education (3) 61:22 62:2 68:12 effect (3) 3:14 35:9 36:3 effects (2) 35:16 41:24 either (4) 58:8 74:24 95:5,17 embarrassed (2) 16:17 98:11 employ (1) 74:7 employed (6) 6:21,24 7:18 12:7 36:21 76:6 employees (1) 93:22 employer (10) 16:3,15,24 17:9 24:22 100:14,17 111:13 112:9 115:12 employment (3)	37:9 63:16,19 Enclosed (1) 122:9 ended (2) 37:10 101:18 engagement (1) 89:11 English (15) 4:8,10 18:3 22:22 66:5,11,14 70:3,6 70:10,17,20,23 123:3 126:23 enroll (1) 68:18 entered (1) 35:17 entire (1) 8:12 entitled (1) 123:10 environment (1) 13:14 ERRATA (1) 133:1 errors (3) 27:11 82:14 95:5 ESQ (3) 2:8,14,21 estimate (2) 37:7 98:18 Euclid (4) 4:25 6:19 9:15 61:21 ex-boss (1) 38:5 exact (3) 11:20 80:23 117:16 exactly (9) 14:15 22:19 37:8 46:8 49:11 80:8 82:17 106:19 115:21 EXAMINATION (4) 5:20 59:6 107:6 131:3 examined (1) 4:18 example (5) 8:13 82:6,15 93:17 110:18 execute (1) 122:12 executed (2) 36:4 122:15 exhibit (46) 18:23,25 19:11 26:3,8 26:14,15 33:3,15,21 33:22 43:3,12 48:17 107:8,12,13,17,24	108:5 111:14,17 112:10 113:10 114:5 115:12 116:3 116:6 119:8,10,14 120:12 121:14 123:10 124:2,6 126:6,7 127:25 129:9 131:9,10,13 131:17,20,23 exhibits (2) 19:13 131:7 existed (1) 36:14 existence (2) 14:21 104:21 expensive (2) 15:25 109:25 experience (2) 78:9 117:17 experienced (1) 117:16 expert (2) 25:7 79:18 EXPIRES (1) 133:25 explain (6) 6:4 13:15 49:19 51:14 100:16 127:13 explained (3) 23:6 127:19 128:6 explaining (1) 52:16 explanation (1) 21:21 express (2) 110:3 127:22 expressed (3) 114:16 128:19 129:7 external (1) 75:16 <hr/> F F (1) 132:3 FABACHER (1) 1:10 fabricating (1) 129:21 facsimile (1) 122:16 fact (4) 23:23 32:3 104:10 118:20 factor (1) 78:3 fair (1)	14:20 faithfully (1) 4:6 fall (3) 79:13,16 99:25 familiar (3) 77:18,25 78:7 family (11) 64:17 65:12 71:9 72:16 73:12,14 74:11 84:22 113:17 113:19 114:15 far (1) 102:2 Fare (2) 91:19 92:2 fast (1) 70:9 faster (1) 110:24 favor (2) 118:3 128:7 February (1) 15:17 feel (10) 16:4 38:10,20 42:7 50:12,13 114:5,24 115:5 127:2 feeling (1) 54:8 feels (1) 53:3 felt (4) 98:12 109:18,20 114:14 fictitious (1) 116:22 figure (1) 47:6 file (6) 24:24 57:14 87:9 88:20 89:7 123:14 filed (4) 24:15 30:15 51:4 90:6 files (1) 21:19 filing (1) 3:5 filings (1) 88:18 fill (8) 23:21,21,23 27:10,20 27:24 28:13 67:3 filled (1) 25:19 finally (4)
--	--	---	--	--

25:17 47:4,7,22 financial (5) 18:12 22:13 65:10 74:3 115:23 find (12) 14:9,12 32:25 53:6 73:15 79:22 111:3 111:22 116:9,14 122:9 130:2 finding (2) 23:18 110:16 fine (7) 43:24 48:10 51:16 87:8 91:19 92:2 99:12 finish (11) 5:23 32:5,12 50:21 51:25 52:12,25 53:23 54:13 56:25 87:19 finished (2) 53:11 87:17 finishes (2) 55:15 57:5 firing (1) 93:22 firm (2) 19:21 33:10 first (22) 4:15 22:14 26:15 29:22 30:10,12,21 30:23 31:10,12 35:23 49:18,19,25 50:2 61:11 67:7 84:5,7 106:12 120:14 124:16 fish (1) 13:17 five (5) 62:9,10 69:7,15 84:18 five-minute (1) 103:22 five-year-old (1) 85:2 Floor (1) 1:20 focussed (1) 110:6 follow (1) 129:25 follow-up (1) 107:5 following (2) 12:8 59:24 follows (1) 4:19	Food (4) 37:2,3,6 112:15 force (1) 3:14 forget (1) 75:19 forgot (3) 108:7,10,17 form (124) 3:9 7:12 9:23 10:18 10:23 11:4,8,13,18 11:25 13:2 15:4 21:16 29:3,12 30:4 30:17 32:18 35:11 35:20 36:7,12,16 43:22 44:23 45:4,8 45:21 46:3 47:11,17 49:4 51:11 57:25 58:13,21 59:3 64:25 66:25 73:18 78:5,12 80:12,22 81:7,12,20 82:10 83:7 85:18 86:16 89:14,20,22 90:4,9,19 91:4,14 92:5,10 93:9 94:3 94:11,15,22 95:10 95:15,21 96:10 97:23 98:10 99:6,16 100:12 101:6,15 102:8 103:2,7 104:17 106:9,18 107:16 109:2 111:10,19 114:8,10 114:19 115:2,4,8,20 116:18,20 117:13 117:15 118:16,18 119:22 120:19,21 121:9,11 123:18,20 124:8 125:7,9,21,23 126:9,11 127:16,18 128:3,5,11,13,22,24 129:11,13 formal (2) 15:9,11 forth (1) 132:15 forward (1) 122:7 found (6) 19:8 90:21 111:6,12 116:21 117:8 four (1) 55:17 Franklin (2) 61:14,19 fraud (6)	20:11 31:22 100:20 116:23 117:19,21 frauds (1) 129:3 free (1) 129:18 FREEHILLS (1) 2:10 freezer (1) 38:12 freezers (3) 37:16,19 38:23 friends (1) 75:4 front (2) 87:24 93:16 frustrated (2) 109:3,13 frustration (1) 38:13 full (4) 6:15 59:15 109:24 113:21 full-time (2) 63:15 64:10 fully (1) 122:15 further (7) 3:8,12 59:5 65:14 107:3 130:4 132:18 future (1) 51:6 <hr/> G <hr/> G (1) 4:14 garnish (1) 111:8 garnishment (1) 24:11 gather (1) 44:11 gathered (3) 44:8,10,20 general (4) 93:3 97:10,11,21 generate (1) 70:23 getting (2) 72:11 111:17 ghost (1) 118:25 girl (1) 84:16 give (7) 20:25 23:13 68:18	82:15 101:17 105:14 107:23 given (6) 4:9 100:23 101:4,12 120:24 132:17 giving (3) 56:11 94:17 101:18 glasses (1) 98:12 go (45) 8:14 13:22,25 18:9,15 20:19 21:7,8,10 22:5 24:23 32:9 35:14 36:23 49:24 54:18 62:25 74:13 75:18 76:21 83:11 84:8,21 87:16 97:17 98:13,20 101:8,21 101:21 103:9,14 105:18 107:8 111:21,22,23,24 112:15 113:15 117:24 119:24 120:22 122:7 128:17 goes (2) 98:3 126:20 going (25) 16:3 17:19,20 18:12 18:15 20:9 35:12,14 50:22 55:4,12,14 68:14 94:7 98:4 104:13 105:11,17 105:17,19,25 110:8 112:3 116:2 123:21 good (14) 5:3,6 20:8 25:7 40:14 40:19 47:7 59:8,9 94:24 95:5 114:22 114:22 124:10 Google (2) 24:9,12 grab (1) 108:15 Grabar (4) 12:14,19 13:5,12 grabs (2) 108:15,16 graduate (1) 64:2 graduated (4) 62:6,11 63:8 64:6 graduating (1) 65:13 great (1) 38:14	greatest (1) 17:21 grocery (4) 12:5 80:6,7 93:12 Grossman (64) 2:14 5:3,7,8,21 18:22 19:15 25:21 26:12 28:21 29:13,16,18 29:23 32:3,13 33:12 33:20 42:25 43:8 47:25 48:10,13 50:3 50:15 52:18,22 53:11,17,21 55:4,9 56:7 57:2,15 59:4 60:2 61:2 107:15 111:9 114:9,18 115:3,7,19 116:17 117:12 118:17 120:18 121:10 122:21 123:2,17 125:6,22 126:10 127:17 128:4,12,21 129:12,23 130:5 131:4 group (2) 8:20 12:4 Guzman (188) 1:5,16 4:1,23 5:1,4,19 5:19 6:1,11,17 7:1 8:1,25 9:1,19 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 26:9 27:1 28:1 29:1 30:1 31:1 32:1 33:1 33:23 34:1 35:1,25 36:1 37:1 38:1 39:1 40:1 41:1,8 42:1 43:1,5,10,13,16 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1,13 58:1,9 58:24 59:1,18,20,23 60:1 61:1 62:1,17 62:19 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 72:24 73:1,4,10 74:1,21 75:1 76:1 77:1 78:1,24 79:1 80:1 81:1 82:1 83:1 84:1,15,22 85:1,6 86:1 87:1 88:1 89:1 89:8 90:1,7 91:1
---	---	--	---	---

92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1,10,15 104:1 105:1 106:1 107:1 107:10,14 108:1,20 109:1,18 110:1 111:1,12 112:1,10 113:1,9 114:1,4,15 115:1,11 116:1 117:1 118:1 119:1 120:1 121:1,20,21 122:1,6 123:1 124:1 124:4,16 125:1 126:1,15 127:1,12 128:1 129:1,7 130:1 130:12 131:4,19,21 132:14 Guzman's (5) 19:13 44:14,18 45:25 112:9	16:18 hearing (8) 30:24 31:13,14,18,24 32:9 58:17 111:24 hearings (2) 122:8 124:14 held (2) 1:18 119:6 help (8) 14:12 25:2 27:19,24 28:13 72:22 111:25 118:11 helped (5) 25:18 26:22 27:4,13 28:17 HERBERT (1) 2:10 hereinbefore (1) 132:15 hereto (1) 3:5 hereunto (1) 132:22 Hewlett (1) 96:25 hide (1) 108:18 high (2) 62:6 98:5 higher (1) 68:11 hire (1) 74:6 hired (1) 73:11 hiring (1) 93:21 history (1) 91:17 hit (1) 41:13 home (6) 13:25 17:11,13 25:4 32:22 103:18 honk (1) 110:23 horrible (1) 14:2 hospital (3) 86:24 87:5,6 hotels (1) 12:18 hours (4) 25:13,16 92:22 93:3 house (1) 33:7	husband (85) 7:18,21 10:3,12 14:12 14:16,22 15:14 16:13 17:12 18:5,19 20:16,21 21:4,24 23:9,13,17 24:15 26:22 27:19,24 28:13 29:8,20 30:11 30:15 31:4 32:21 34:16,19,24 35:18 36:5,18 37:24 38:2 38:6,10,20 39:13,14 40:4,14,25 41:4,15 46:11,22 51:5,8 54:25 58:24 73:10 73:15,21 75:3 78:23 80:13 81:16 85:4 86:7,18 87:9 88:21 89:25 91:2,18 95:7 96:7 99:3,13,19 101:11 102:5,23 103:9 104:6 106:3 117:11 118:4 128:8 128:18 129:14 husband's (6) 9:20 38:16 47:15 90:12 91:16 104:4	52:4 53:9 included (1) 105:23 includes (1) 76:15 income (1) 88:17 incorrect (1) 112:21 index (5) 20:18,24 21:9 22:24 29:20 indirectly (3) 74:13,15,24 inform (1) 117:6 informal (1) 15:11 information (2) 75:15 76:22 injured (2) 41:8,15 injuries (1) 41:24 injury (1) 41:17 innocent (1) 110:11 insist (1) 52:14 institution (3) 18:13 22:13 115:23 instruct (2) 43:22 50:4 instructed (1) 53:12 intentionally (1) 52:7 interested (1) 132:20 internet (5) 116:2,16 117:8,18 128:18 interpreter (6) 2:24 4:3,19 58:2 91:6 126:22 interrupt (1) 54:6 interrupting (2) 52:5 53:15 introduce (1) 5:11 invited (1) 73:20 invoice (6) 81:25 82:7,17 83:2,9	84:6 invoices (1) 81:22 involved (4) 85:25 86:4,8 87:22 Island (1) 9:14 issue (4) 82:22 108:20,23 125:4 item (1) 126:19 items (1) 23:22
H				J
H (3) 1:10 4:2,2 H&R (5) 65:20 69:20 88:19,24 89:6 hand (2) 100:24 132:23 hands (2) 101:4,13 happen (3) 17:19 42:3 118:10 happened (14) 20:22 21:13 23:4,7,9 30:20 31:7,15 32:20 41:11 53:13 117:10 118:5 126:16 happening (1) 77:19 happens (4) 83:8 93:2 118:8,9 hardware (2) 64:12,18 harm (1) 129:22 Harris (14) 1:8,9 20:6 26:11,13 33:9 111:7 116:8,15 116:22 117:9 118:25 122:20 123:25 headache (1) 115:21 hear (1)				January (3) 15:17 97:19 98:7 Jeffrey (2) 2:21 5:14 job (33) 1:25 12:12,13 14:9,13 15:23 38:9 63:24 64:10,14,20 67:7,18 70:16,20 72:7,9,11 72:14,18 75:6 80:5 81:23 93:24 94:4,8 105:11,20,22 110:16 111:3 112:11,14 JOHN (1) 1:12 joined (1) 15:15 joint (3) 10:13 88:20,22 jointly (2) 89:8,9 Jose (24) 1:5 5:18 8:16 33:22 41:7 43:4,10,12 58:9,24 89:8 90:7 103:10,15 107:10 108:9,15 121:20 122:6 124:11,15 126:12 131:18,21 judge (15) 23:12 26:24 30:19,22 30:24 31:9,13 87:24 101:21 104:25 109:10 111:23 117:24 118:2 124:15 judgment (26) 25:25 26:5 29:10 33:17 34:4 35:17

36:4,9 48:18,24 57:10,11,12,22,23 58:5,11,19 87:17 122:10 123:12,12 124:20 125:2 131:12,15 judgments (2) 51:6,7 July (1) 123:23 jumping (1) 55:8 June (2) 1:20 132:23 Jurisdiction (1) 123:13 justice (2) 47:4,22	96:9,17 97:22 98:9 99:5,15 100:11 101:5,14 102:7,25 103:6 104:9,16 105:9 106:8,17 107:4,7 119:4,7 120:4,9 122:24 126:24 131:6 keys (2) 38:8 93:10 kind (3) 12:15 105:13,15 knew (9) 18:8 28:15 57:9,21,22 58:4,10 67:25 92:17 know (80) 13:19 17:18,22 18:7 18:10,10 21:22 22:19,21,24 23:23 24:14,20 25:9 29:8 31:7 32:11 35:3,24 37:5,9,14 38:22 39:25 41:4,20 42:11 47:8 51:12 52:17 54:22 58:5,14 73:3 74:2,4 77:8,11 78:6 78:13 79:5 81:14,16 81:21 84:12 87:21 87:21 88:5 89:22,24 90:5 92:12,14,14 95:4,13 97:3,24 98:7 103:20 106:22 108:4 110:17 112:3 112:8,11,22,25 113:14 114:11 115:17,22 117:20 118:13,14 121:16 124:21 125:25 126:2 129:15 knowing (1) 94:17 known (2) 38:3 104:21 knows (1) 118:8	37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1 104:1 105:1 106:1 107:1 108:1 109:1 110:1 111:1 112:1 113:1 114:1 115:1 116:1 117:1 118:1 119:1 120:1 121:1 122:1 123:1 124:1 125:1 126:1 127:1 128:1 129:1 130:1 L-A-U-R-A (1) 59:12 L.R (10) 5:9 22:11 30:5 111:7 116:7,15,21 117:9 118:24 128:20 Lack (1) 123:13 lag (1) 56:4 language (1) 51:13 Laparoscopic (1) 41:22 Lara (5) 1:16 4:23 5:19 103:13 103:15 large (1) 88:10 late (1) 13:7 Laura (4) 6:17 130:12 131:4 132:14 law (7) 1:18 2:4 19:20 33:9 69:11,16 76:4 lawsuit (23) 30:9 42:21 43:20 46:6 46:7 51:9 57:14	86:5,8 87:9,12 88:2 89:10 90:6,17 104:8 106:4,5,14 118:14 119:15 120:13 131:24 lawsuits (1) 86:13 lawyer (5) 89:18 90:2,12,16 129:8 lawyers (1) 85:21 learned (5) 14:21,25 77:2,5 78:8 leases (1) 39:12 leave (5) 13:11,20,24 17:2 100:2 left (11) 12:9 15:19,22 36:19 61:19 62:3 102:10 112:10,14 113:10 129:4 legal (5) 27:13 78:22 87:22 113:5 117:21 let's (7) 8:6 74:12 91:16 92:16 103:21 113:15 128:17 lets's (1) 91:23 letter (53) 16:2,14,23 17:8,10,12 17:16,25 18:6,19 19:7,21 24:19,21 31:19,20,21,23,25 32:8,21 33:9 34:7 49:18,20 50:2,2,24 50:25,25 51:15 52:15 89:11 98:19 98:21,25 100:15,18 102:15 109:7 111:13 113:9 114:4 115:11,16 120:24 121:19,22 122:2 123:25 124:5 128:14 131:21 letters (3) 108:15 116:25 117:3 letting (1) 49:17 level (1) 62:2 Lexington (1)	2:12 liable (1) 57:13 liars (1) 124:12 license (2) 129:3,17 licensed (1) 62:12 Lichtman (42) 2:21 5:13,14 16:18 26:7 27:2 29:17 42:20 51:19 54:3 59:7 91:8 103:21,25 107:2 108:25 111:18 112:17 113:3,12 114:7,25 116:19 117:14 118:15 119:21 120:20 121:8,25 122:23 123:19 124:7 125:8,20 126:8 127:15 128:2 128:10,23 129:10 130:3 131:5 lie (4) 100:25 104:20 120:3 129:4 lies (3) 100:20 129:21,22 life (5) 36:25 38:23 104:19 104:20 109:5 light (1) 41:12 liked (1) 72:15 likes (1) 95:22 Lincoln (1) 34:8 line (1) 25:15 lingering (1) 42:5 listed (5) 18:19 19:21,24 20:3 33:4 listen (1) 112:22 little (5) 13:21,24 16:16 66:18 125:11 live (7) 9:5,8 61:11,15 71:7 72:2 84:24
K keep (2) 110:25 122:13 keeps (1) 94:7 kept (1) 97:17 KERRY (1) 1:10 Keshavarz (143) 1:19 2:4,8 5:17,18 7:11 9:22 10:17,22 11:3,7,12,17,24 12:25 15:3 17:3 19:10 21:15 27:6,21 29:2,11,15 30:3,16 32:2,5,16 34:6 35:10,19 36:6,11,15 42:15 43:21 44:3,7 44:22 45:3,7,20 46:2,13,25 47:10,16 48:4,20 49:3,12,15 49:21 50:6,9,17 51:10,17,25 52:12 52:20,24 53:14,19 53:25 54:5,12,18 55:3,7,18 56:23 57:4,24 58:12,20 59:2 60:4 64:24 66:24 73:17 78:4,11 80:11,21 81:6,11,19 82:9 83:6 85:17 86:9,15 89:12,13,17 89:19 90:2,3,8,11 90:15,18,25 91:3,13 92:4,9 93:8 94:2,10 94:14,21 95:9,14,20	L L (127) 4:1,14 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1			

<p>lived (3) 9:17 71:6 80:25</p> <p>living (1) 79:2</p> <p>LLC (3) 1:8,8 2:11</p> <p>loaded (2) 110:19 113:21</p> <p>located (2) 80:20 96:24</p> <p>location (2) 9:13 101:25</p> <p>long (22) 7:3 8:8 9:14 11:15 12:19 15:13 16:12 37:5,8 38:3 39:17 61:15 63:23 65:24 70:14 91:20 102:10 105:17 111:6,8 112:8,11</p> <p>longer (1) 36:14</p> <p>look (14) 18:9 19:17 20:17 21:8 22:12 24:23 26:15 89:21 96:15 113:23 119:3 120:14 121:15,16</p> <p>looked (2) 25:11 48:17</p> <p>looking (1) 90:22</p> <p>looks (1) 89:22</p> <p>lose (2) 105:11,20</p> <p>lost (2) 23:19 91:7</p> <p>lot (9) 28:3 42:7 98:24 99:22 99:24 100:4 116:22 116:23 117:18</p> <p>LR (2) 1:8 2:11</p> <p>LUTZ (1) 1:10</p> <p>lying (3) 22:16 109:6,6</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>M (4) 4:14 6:17 59:13 131:4</p> <p>ma'am (2) 123:7 129:23</p> <p>maiden (2) 59:21 103:12</p>	<p>mail (3) 108:14,14 121:22</p> <p>mailed (1) 127:24</p> <p>main (1) 100:19</p> <p>major (1) 68:8</p> <p>making (1) 73:22</p> <p>man (1) 38:16</p> <p>man's (1) 38:13</p> <p>manager (5) 80:6,7 91:25 92:19,19</p> <p>Manhattan (1) 87:6</p> <p>marble (30) 6:25 7:4,7,18 14:17 14:21 15:14,20 16:13 66:20 67:6 71:11 72:8,10 73:5 73:16 74:10,22 75:4 75:7,10 76:7,10,15 81:23 82:2 83:23 91:24 110:3 112:14</p> <p>Marcella (1) 59:16</p> <p>March (5) 79:12,12,16,23 112:15</p> <p>mark (5) 18:22 25:23 33:12 42:25 119:7</p> <p>marked (10) 19:2 25:22 26:5 33:3 33:18 43:6,11 119:11,16 121:14</p> <p>Market (9) 8:2,9,12 12:4,9 67:13 67:18 70:16 80:10</p> <p>markets (1) 67:11</p> <p>marking (1) 43:8</p> <p>marriage (4) 62:19,20,22 132:20</p> <p>married (5) 8:25 41:2 62:14,16 72:24</p> <p>Marva (4) 1:21 4:16 132:11,25</p> <p>material (4) 109:14,24 110:20 113:20</p>	<p>materials (2) 64:13 84:9</p> <p>matter (4) 4:4 127:7,10 132:21</p> <p>mean (11) 10:25 47:13 57:22 58:23 76:19 87:15 95:17 100:8 112:5 117:4 118:22</p> <p>meaning (1) 55:2</p> <p>means (3) 49:11 51:3 126:4</p> <p>meant (1) 54:15</p> <p>mechanic (3) 37:17 38:25 39:3</p> <p>mechanics (1) 37:16</p> <p>medication (1) 99:4</p> <p>medications (3) 95:8,12 96:2</p> <p>medicine (2) 95:18,19</p> <p>meet (2) 7:21,23</p> <p>Mel (12) 1:8,9 26:11,13 111:7 116:8,15,22 117:9 118:25 122:19 123:25</p> <p>mention (2) 49:17,25</p> <p>mentions (1) 99:2</p> <p>merchandise (2) 15:25 114:3</p> <p>meritorious (1) 28:10</p> <p>met (6) 7:22 78:23 79:11 80:4 91:21 92:19</p> <p>MICHAEL (1) 1:11</p> <p>middle (2) 66:23 124:20</p> <p>mind (2) 110:7 111:2</p> <p>mine (4) 30:13 46:23 96:14 108:15</p> <p>minute (1) 28:6</p> <p>minutes (1) 83:16</p>	<p>mirrors (1) 113:24</p> <p>missing (1) 126:18</p> <p>mistake (5) 82:7 83:15,18,20 84:13</p> <p>mistakes (1) 82:12</p> <p>mixing (1) 72:16</p> <p>Mlotok (3) 1:12 2:18 5:16</p> <p>mom (1) 71:6</p> <p>moment (4) 20:25 30:12 55:24 56:6</p> <p>money (7) 11:22 29:6,9 30:13 47:2 83:4 109:12</p> <p>month (4) 16:9 24:25 45:12,13</p> <p>months (5) 12:11 16:9 37:7 45:15 112:16</p> <p>morning (3) 5:3,6 21:7</p> <p>Morningside (1) 2:25</p> <p>mother's (1) 103:12</p> <p>Motion (2) 122:21,23</p> <p>move (8) 32:13 47:25 50:9 60:4 61:5,8,18 113:3</p> <p>moved (1) 21:19</p> <p>music (1) 67:9</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>N (4) 4:2,2,14 131:2</p> <p>name (27) 4:21 5:7,13 6:16 10:16 18:18 19:5,20 30:12 31:14 39:12 59:10,15,17,19,21 70:7 83:12,24 87:5 96:15,16,20 103:12 103:14 107:10 133:2</p> <p>names (5) 30:8,9 71:15 103:10</p>	<p>116:5</p> <p>NANAXHI (1) 2:24</p> <p>Nancy (6) 71:19 74:17 75:20,24 76:8,11</p> <p>Nassau (1) 70:8</p> <p>natural (1) 55:20</p> <p>near (1) 80:24</p> <p>necessarily (1) 77:21</p> <p>need (10) 18:16 19:16 21:18 23:14 26:19 34:9 48:4 52:8 111:3 112:4</p> <p>needed (5) 18:8 37:19 38:14 72:22 98:12</p> <p>negative (1) 41:24</p> <p>never (11) 29:21 72:15 78:14 81:3 100:6 104:24 106:10,11,15 114:11 118:6</p> <p>new (18) 1:3,20,22 2:7,13,13 2:20,20 4:5,17 5:2 6:20 12:12 96:25 108:8 132:6,9,12</p> <p>nickname (1) 103:17</p> <p>night (1) 99:23</p> <p>nightmare (1) 21:21</p> <p>nine (1) 93:3</p> <p>non-confidential (1) 60:8</p> <p>Non-Party (1) 1:17</p> <p>non-responsive (1) 50:19</p> <p>nonresponsive (1) 48:2</p> <p>normal (1) 55:11</p> <p>normally (1) 82:21</p> <p>Notary (7) 1:22 3:14 4:5,16</p>
---	--	--	--	---

130:16 132:12 133:25 noted (1) 130:9 notice (1) 83:11 notified (4) 101:22 106:5,6,13 notify (2) 118:21 119:2 November (4) 43:5 46:11 107:11 131:19 number (16) 5:22 11:21 18:18 19:5 19:23 20:18,24 21:9 22:21,24 54:22 93:10 97:3 107:9 121:14 122:17 numbers (1) 19:12 nutshell (1) 114:13	111:9,18 113:12 114:7,9,18,25 115:3 115:7,19 116:17,19 117:12,14 118:15 118:17 119:21 120:18,20 121:8,10 123:17,19 124:7 125:6,8,20,22 126:8 126:10 127:15,17 128:2,4,10,12,21,23 129:10,12 objections (2) 3:9 50:18 obtain (1) 22:4 obvious (2) 56:17,18 occasion (4) 21:11 22:6 45:24 46:5 occasions (1) 84:2 October (4) 33:18 34:5 48:21 131:16 off-the-record (1) 119:5 offering (1) 13:13 office (4) 22:21 67:20 98:22 122:6 officer (1) 65:11 offices (3) 1:18,19 2:4 official (1) 4:3 oh (4) 23:12,16 32:23 66:7 okay (17) 6:5,10 10:2 23:20 26:16 28:8 42:24 43:14 47:7 54:12 66:9 87:8 115:25 118:3 121:18,24 126:5 old (1) 84:17 older (1) 66:18 Once (1) 57:6 ones (1) 73:22 online (1) 108:12	oOo (1) 3:16 oOo- (1) 4:12 open (7) 14:25 83:11,22 93:11 110:11 126:4 128:16 opened (6) 29:21 43:5 106:11 107:10,11 131:19 opening (2) 72:14,18 operation (1) 95:8 opportunity (3) 56:3 85:22 128:16 opposed (1) 115:5 opposing (1) 124:25 order (6) 1:18 25:24 26:4 49:18 123:11 131:11 orders (2) 93:12,13 original (1) 115:18 originally (1) 106:14 Orkina (2) 122:16,19 outcome (1) 132:21 outside (1) 85:22 over-alert (1) 104:12 over-the-counter (2) 95:18,25 29:6 30:13 83:3 owed (2) 29:9 106:15 owes (1) 109:11 owned (7) 64:12,15 80:17 81:17 83:10 102:5,19 owner (5) 8:13 37:15,22 38:18 72:4 owning (1) 81:5 owns (1) 71:11	P p.m (1) 130:9 Pablo (10) 71:19,21 72:5,11 73:9 73:19 74:17 76:3,8 76:11 page (11) 28:6 33:5,16 34:2 35:6 120:14 121:16 123:9,21 131:3,14 paid (2) 65:4 106:2 pain (2) 42:2,5 pains (2) 42:8,9 paper (4) 83:9 101:3,10 108:14 papers (13) 23:14,21,24 24:15 32:10 89:22,25 100:23 101:17,21 101:24 111:23 120:24 paperwork (3) 24:3 25:3,4 paragraph (2) 124:19 127:3 PARNAGIAN (1) 2:16 part (2) 8:16 63:17 part-time (3) 63:18,24 64:14 parties (2) 3:4 132:19 partner (1) 73:20 partners (2) 71:13 74:4 party (2) 58:8 86:8 passed (1) 113:8 patterns (1) 104:4 pause (6) 55:20,22,23 56:5,6,21 pausing (1) 56:15 pay (7) 17:20 64:21 66:17 75:14 81:22,24 82:2 payable (2) 76:16 77:2	payables (1) 12:22 payment (3) 46:17 75:11 87:25 pending (2) 52:19,21 people (19) 17:22 20:10 22:16 25:17 71:8 100:10 100:25 109:5 116:23 117:2,4,17 117:22 118:8,24 124:12 129:2,17,19 performances (1) 94:20 period (5) 8:4,12 64:9 70:14 128:15 person (11) 19:6 23:11,20 71:11 74:8 83:14 101:19 117:25 118:21 119:2 120:2 personal (9) 65:23,25 75:3 88:12 88:15 90:16 105:14 119:24 123:13 personally (2) 78:10 90:15 Pg (1) 133:5 phone (3) 18:18 19:5,23 phrase (4) 43:23 118:12 124:25 125:5 phrases (1) 125:18 piece (1) 101:9 place (4) 83:5 93:11,13 102:10 places (1) 108:16 plaintiff (4) 1:6 2:5 51:8 127:9 please (13) 4:21 5:11 6:3,15 16:19 26:24 54:12 56:24 59:11 64:16 122:9,12,15 pleased (3) 47:5,15,19 point (10) 6:2 30:15 72:21 80:18 99:10 111:12 112:2
--	--	---	---	---

115:10,16 125:5 points (1) 23:22 portion (11) 16:20 17:5 28:14,23 29:24 32:14 57:16 57:18 59:24 60:9 91:10 portions (1) 48:2 position (4) 8:19 12:21 14:3,25 possibility (1) 57:11 possible (6) 14:14 101:20 109:5 118:5,10 122:18 postponing (1) 97:18 potential (3) 51:5 126:21 127:5 practice (1) 129:3 practicer (1) 97:10 pregnant (1) 12:10 prejudice (3) 54:23 126:20 127:4 prepare (3) 26:22 27:5,14 prepared (2) 88:17 89:5 prescription (2) 95:18,25 present (3) 2:23 85:24 111:22 presented (3) 30:18,21 57:8 previously (2) 25:22 102:16 price (3) 93:18,19 110:3 primary (2) 96:11,13 prior (2) 9:5 107:25 prison (1) 129:18 private (1) 74:4 privilege (1) 48:9 pro (4) 25:10,12 27:13 28:17 probably (1)	15:12 problem (6) 99:13,19,21 104:13 110:9 111:2 problems (1) 118:6 proceed (1) 57:14 process (2) 23:15 24:3 professional (1) 129:17 program (3) 70:9,13 89:6 prompted (2) 53:18 56:12 proof (1) 109:11 proper (1) 50:20 propounded (1) 4:7 prove (1) 110:10 psychiatrist (1) 103:5 psychologist (2) 102:24 103:5 public (9) 1:22 3:14 4:5,16 62:4 62:13 130:16 132:12 133:25 purpose (1) 53:9 purposes (2) 42:20 43:19 pursuant (1) 1:18 put (1) 76:21 putting (1) 121:3 <hr/> Q question (45) 3:10 6:9 9:25 16:11 16:19 17:4 27:3,16 28:22 32:4 34:10 50:5,7,11,16 51:11 52:2,19,21,22 53:2 53:24 54:4 55:16 56:12,17 57:3,25 58:3,7,13 68:9 78:5 80:12 85:19 90:19 91:7,9 94:3 107:16 111:11 112:8,22	113:4 123:3 questioner (1) 56:15 questions (13) 4:7 5:23,24 6:3,7 48:14,17 54:17 56:20 59:5 85:23 107:5 129:24 quick (1) 120:5 <hr/> R R (2) 4:14 132:3 raise (1) 98:2 rare (1) 83:8 reached (1) 87:20 reaction (2) 46:21 47:3 read (31) 16:21 17:3,6,24 18:3 20:5,8 22:10,14 28:15,21,24 29:23 29:25 30:12 32:21 54:4 57:15,19 70:20 91:8,11 118:4 122:4 123:6,15 124:9 126:23,24 128:18 133:5 reading (1) 123:4 reads (3) 28:10 123:3 133:5 realizes (1) 83:15 really (12) 37:18 38:5 72:19 75:13 94:23 95:4 97:5,6 105:5 116:12 117:2,23 reason (6) 47:9 95:13 108:11 114:14 122:24 133:5 reasonable (1) 56:21 reasons (1) 113:5 recall (14) 7:6,9 14:6,24 15:7,13 15:19,22 16:8 18:17 30:14 31:15 40:24 41:7	receivable (4) 64:23 77:6,9,12 receive (6) 23:24 24:10,11 83:10 84:9 98:25 received (12) 16:2 18:20 22:23 24:21 31:18 33:9 46:11,22 82:18 86:25 100:14 124:9 receives (1) 98:19 receiving (2) 18:6 124:5 recess (2) 103:23 120:7 recognize (7) 34:10 43:15 83:20,21 84:2,6,6 recommendation (1) 15:10 recommended (1) 15:8 reconcile (1) 75:12 record (20) 4:22 6:16 16:21 17:6 19:10 28:24 29:25 33:24 52:7 53:19 56:8 57:19 91:11 104:2 112:17 119:4 120:10 122:5,14 132:16 records (2) 81:17 111:22 referring (10) 30:5 44:24 46:4 68:15 69:4,9 76:24 100:13 118:20 120:25 reflect (1) 56:14 refuse (1) 32:8 regarding (1) 127:6 Regardless (1) 47:9 regularly (1) 70:17 related (12) 65:15 68:21 71:21,24 74:9,15,21 76:7,11 91:19 127:9 132:18 relates (1) 58:7 relating (1)	101:10 relation (1) 70:20 relationship (3) 75:23 117:7,10 relaxed (1) 94:5 relay (1) 98:8 released (1) 127:11 remain (1) 110:6 remember (36) 7:8 14:11,15 15:5,21 18:12 19:18 21:20 29:4 39:19 45:9 46:8,9 65:2 67:14 70:7 73:6,7 79:6,8 79:10 80:7,23 82:3 82:5,13 86:11,12 88:9 90:14 96:17 102:2 108:19 113:7 116:3 125:2 remembering (1) 105:4 remind (1) 108:9 reminds (1) 98:20 rent (1) 17:20 reopen (4) 23:12 24:3,15 26:24 repair (1) 37:17 repeat (2) 58:2 91:6 rephrase (1) 6:4 replaced (1) 37:20 Reported (1) 30:6 reporter (10) 1:22 4:20 16:22 17:7 28:25 30:2 57:20 85:23 91:12 132:11 represent (6) 5:12,18 26:11,13 90:23 119:25 representing (4) 5:15 34:19,23 90:25 request (1) 22:3 requested (7)
--	---	--	---	---

16:20 17:5 20:23 28:23 29:24 57:18 91:10 research (2) 25:8 54:24 researched (1) 22:15 reserved (1) 3:10 respect (1) 20:7 respective (1) 3:4 respond (1) 52:14 response (1) 83:13 responsibilities (5) 75:9 76:14 93:6 94:13 94:18 responsible (1) 51:5 responsive (3) 32:15 50:10 56:11 rest (1) 74:25 restate (1) 58:6 restaurants (1) 12:18 resume (2) 15:6 72:20 retained (1) 89:17 retaining (2) 89:11 90:15 return (2) 82:18 88:20 returning (1) 38:8 returns (1) 88:21 reversed (1) 79:20 review (4) 9:19 25:8 28:7 122:12 reviewed (1) 25:5 reviews (1) 34:12 right (29) 16:6 39:15 51:2 54:15 62:23 64:7,10 68:2 69:17 72:25 76:16 77:3,6,13,23 78:24 79:13 85:13 87:3	90:7,12 92:3,20 102:16,17 107:12 111:14 129:15 130:7 Road (3) 101:25 102:6,13 Robert (2) 2:14 5:7 Roosevelt (3) 37:2,3,6 Rosemary (2) 122:16,19 ruin (3) 104:20 109:5 120:2 rushing (1) 56:16 <hr/> S <hr/> S (2) 1:8,9 S-A-C-K-O-L-I-K (1) 96:21 S-I-E-N-A (1) 7:2 Sackolik (3) 96:19 97:12 98:14 Sackolik's (1) 98:22 safe (5) 109:18,20 114:5,14 114:24 safety (2) 40:16 85:11 salary (4) 12:24 14:7 16:4 18:11 Sam (1) 5:15 Samserv (2) 1:11 2:17 savings (9) 10:7,10,16,20,24 11:11 43:4,9 131:18 saw (3) 25:17 38:25 115:11 saying (8) 16:3 47:24 53:8 109:7 112:2 116:25 117:21 120:23 says (12) 22:11 23:22 30:24 54:23 101:3,11 118:2,5 124:20 126:18,19 127:3 scared (1) 98:4 schedule (3)	25:11 92:25 93:14 scheduled (1) 122:8 school (2) 13:22 62:6 Sea (8) 7:25 8:9,11 12:4,9 67:13,17 80:10 seafood (1) 12:17 sealing (1) 3:5 search (2) 116:6,10 searched (1) 116:15 seasons (2) 79:19 114:24 second (9) 33:15,25 35:6 62:20 62:22 78:19 121:16 124:18 131:13 section (4) 27:7,23,25 28:9 sections (1) 28:3 see (19) 16:23 17:8 19:20 20:6 28:18 29:5 35:5 73:6 74:7 83:23 96:7 97:12 101:3 113:24 117:25 124:15 126:6,16 129:2 seeing (1) 8:4 seen (5) 26:17,20 100:7 101:9 102:23 sees (1) 96:11 seize (2) 16:3 18:11 sell (1) 78:18 selling (1) 78:2 sells (1) 72:8 semesters (1) 70:15 send (4) 83:17 108:4 116:23 116:25 sending (2) 66:16 100:18	sends (1) 83:15 sense (2) 11:21 72:12 sent (9) 16:14,24 17:10 35:22 72:20 82:8 83:4 117:22 123:25 sentence (2) 55:6 60:5 separate (3) 46:5 59:25 88:21 separately (1) 89:8 Serv (1) 5:15 served (2) 47:4,23 service (1) 93:20 set (3) 108:12 132:15,22 settle (1) 87:17 settlement (1) 87:21 seven (3) 61:17 64:19 112:16 shamelessly (1) 101:2 share (1) 75:15 SHEET (1) 133:1 shopping (1) 63:21 short (3) 38:6 103:23 120:7 shorter (1) 28:3 Shorthand (2) 1:21 132:11 show (9) 25:24 26:4 53:20 112:18 121:13 123:11 124:16 126:13 131:11 showing (2) 120:11 123:9 shown (1) 27:17 siblings (2) 71:7 76:2 Siena (38) 6:25 7:4,7,17 13:6,12 14:4,10,17,21 15:14	15:19 16:13 36:19 36:22 66:19 67:6,11 70:16 71:11 72:10 73:4,16 74:10,22 75:4,7,10 76:6,10 76:15 81:23,25 83:23 91:24 108:21 112:14 113:11 sign (5) 32:10 35:24 89:11 126:17 127:14 Signature (1) 133:21 signatures (1) 35:5 signed (10) 3:13,15 34:18,21,25 89:17,25 122:19 123:22 129:9 significance (1) 54:21 significant (1) 46:12 signing (1) 127:23 similar (1) 35:22 situation (5) 37:23 77:12 82:3,6 101:23 Situations (1) 82:19 six (3) 16:9 64:19 93:4 size (1) 114:23 sleep (3) 99:14,19 104:11 sleeping (1) 104:4 slide (1) 114:3 slowly (2) 110:21 113:25 slowly-slowly (1) 110:20 small (1) 113:19 smelled (1) 13:16 SMITH (1) 2:10 sold (3) 64:13 81:9,14 solve (3) 93:2 110:8 111:2
---	--	--	--	--

somebody (1) 81:24 soon (1) 122:17 sooner (1) 39:3 sorry (4) 21:18 24:7 66:7 83:17 sort (1) 22:22 sounds (1) 126:3 source (3) 19:8 20:13 46:14 South (2) 61:14,19 SOUTHERN (1) 1:3 space (1) 95:5 span (1) 38:24 Spanish (6) 2:24 4:8,9 126:3,4,25 speak (3) 56:13,19 72:10 speaking (3) 47:8 55:11 56:10 specialties (1) 98:24 specialty (1) 97:9 specific (5) 65:5 68:4 75:6 112:7 114:2 specify (1) 81:8 spell (1) 96:20 spelled (1) 59:11 spring (2) 7:10 79:15 Square (1) 34:8 ss (1) 132:7 start (4) 67:12 74:12 100:20 116:25 started (18) 7:7 15:16,17 16:9,10 19:19 32:24 53:15 66:16 67:5,10,17 73:4 94:16,17 104:8 110:15 111:20	starting (1) 63:19 state (8) 1:22 4:5,17,21 6:15 27:22 132:6,12 statements (16) 9:20 42:13 43:4,10 44:2,11,12,14,17 45:18,25 75:12 76:19 107:24 108:5 131:18 States (10) 1:2 65:17 67:5,8 69:20,23 70:2 71:2 79:14 86:5 stay (2) 93:2 100:2 stipulated (4) 3:3,8,12 68:23 stipulation (7) 33:16 34:3 48:6,18 127:24 129:9 131:14 stipulations (2) 122:10,13 stop (1) 110:21 stopped (4) 37:20 41:12 55:10 81:5 stops (2) 55:5 56:10 store (13) 64:12,18 80:9,17,20 81:2,5,10,18 83:24 93:11 102:5,20 stores (4) 12:5 80:3 91:19 92:2 story (1) 37:13 straighten (1) 82:22 Stream (10) 5:2 6:20 9:14 61:9,10 71:2,5 72:2 84:25 97:2 street (9) 1:19 2:6,19 4:25 6:19 9:15 61:21 79:8,9 stressed (1) 16:4 stressful (1) 93:24 strike (7) 32:13 43:23 47:25 113:3 122:22,23,25	study (2) 65:19 66:11 subject (1) 29:10 subjects (1) 68:16 subpoena (3) 117:5 118:13 121:7 Subscribed (2) 130:13 133:22 sued (1) 86:13 suffer (1) 41:23 suing (1) 22:12 summer (4) 7:16 13:7 15:18 112:13 summons (7) 101:12 119:14 120:12 120:15 121:5,6 131:23 supermarket (7) 7:25 8:18 36:24,25 37:15 38:19 68:3 supermarkets (4) 8:14,15,20 92:25 supervisor (1) 38:17 support (4) 25:24 26:3 123:11 131:10 supposed (1) 97:17 supposedly (2) 23:19 101:7 sure (12) 13:10 16:12 25:19 27:10,16 56:2 57:6 66:9 76:22 91:8 93:12 100:3 surgery (6) 41:19,21 42:6 86:19 87:2,4 surprised (1) 32:23 sworn (6) 3:15 4:4,16 130:13 132:16 133:22 system (1) 68:11 <hr/> T <hr/> T (2) 132:3,3	T-U-S-T-I-N (1) 71:17 take (24) 7:14 18:15 19:16 26:18 28:6 34:9 38:14 63:11 65:14 65:22 68:13,25 69:22 70:2,5 88:14 95:24 99:3 103:21 105:12 112:4 118:20 120:5 121:15 taken (6) 1:17 6:11 88:11 95:12 103:24 120:8 talk (5) 48:7 50:25 91:23 92:16 104:12 talked (2) 104:3 115:25 talking (2) 53:10 86:14 talks (2) 104:18 106:3 taught (1) 67:9 tax (3) 88:17,18,23 taxes (8) 65:20,23 66:2 69:10 88:12,15 89:5,7 teach (1) 68:4 technical (4) 28:20 35:4 51:12 121:2 tell (20) 6:3,12 20:21 21:13 22:8 28:17 37:8,13 47:19 61:25 64:16 72:17 81:4,9 98:17 106:6 111:17 119:24 124:15 126:15 tells (2) 95:2 99:23 temper (1) 38:6 ten (2) 64:5 83:16 ten-year (1) 64:9 term (3) 32:11 54:23 87:22 terminology (2) 52:17 125:14	testified (2) 4:18 58:10 testify (1) 96:18 testimony (3) 108:19 120:17 132:17 Thank (5) 5:4 59:4 129:23 130:5 130:7 theory (2) 78:13,16 thing (11) 23:17 35:4 49:8 75:18 84:7,11 100:19 120:25 124:17,18 125:16 things (7) 20:8 38:7 42:18 68:4 72:19 116:23 117:17 think (35) 7:13 15:16 27:2 28:2 28:3 31:13 41:2,13 43:24 45:14,16,22 52:6 53:14,18 55:22 55:24 56:4,8 72:20 73:19 79:9,21 81:13 83:3 86:17 87:20,23 89:2 97:8 109:20 111:2 117:5 118:7,9 thinking (5) 51:23 68:10 110:8,15 121:7 thinks (3) 52:3 104:13 129:16 third (3) 22:2 24:24 28:6 thought (5) 110:25 124:10,17 125:24 126:2 thousand (1) 12:2 three (10) 8:14 12:20 37:7 55:17 70:13,15 71:13 96:7 101:17 122:9 tight (1) 13:19 tile (4) 6:25 7:4,7 83:24 tiles (2) 7:18 72:8 time (67) 3:10 7:14,25 8:4,20 8:24 9:6,9 11:23 12:3 13:19 16:7,19
---	--	---	---	---

19:16 21:18 22:2,3 22:9 24:24 26:18 29:19 34:9 36:19 38:3 40:7,24 41:7 42:8 43:18,25 44:10 44:21 46:10 55:5,15 63:17 67:4,5 70:14 70:18 79:3,10 80:2 81:17 84:21,21 91:23 92:2,16 93:7 93:25 94:8 96:6,6 97:25 98:20 102:4,9 102:9,10,12,14 112:25 113:8 115:10,16 130:9 timeline (1) 67:4 times (12) 37:17 54:14 55:17 83:14,25 94:4,6 101:17 110:9,22 111:21 114:20 tired (2) 40:10,12 title (3) 8:21 65:5 67:20 titled (1) 34:3 today (5) 5:5,23 6:12 85:20 86:14 TODD (1) 1:10 told (15) 14:24 20:23 21:17 22:10,19 23:8 25:5 29:9 31:4 81:13 92:11,13 97:25 124:11 126:17 tolerate (1) 55:14 tosses (1) 99:22 total (1) 124:22 trained (2) 67:19,22 transaction (2) 119:11 131:20 transcript (2) 60:9 66:10 translate (2) 4:6 126:25 translated (1) 125:15 translates (1)	49:16 translation (2) 2:25 125:5 translator (6) 48:7 55:19,21,23 56:4 66:6 translator's (1) 125:10 transmit (1) 122:15 traverse (7) 31:13,18 32:9 35:14 58:16 122:8 124:13 treated (3) 39:7 86:22 103:4 treatment (1) 86:25 trial (1) 3:11 trials (1) 51:6 tried (3) 27:10 101:16 104:19 trips (2) 84:22 85:4 truck (17) 15:23 16:5 41:13 108:21,24 109:15 109:23 110:5,14,19 113:15,17,23 114:6 114:12,17 115:6 true (5) 28:16 55:9 100:24 124:10 132:16 truth (5) 6:12 13:17 47:8,24 106:24 try (5) 6:4 20:17 27:15 78:20 104:12 trying (5) 22:12 54:24 58:6 108:18 111:7 turn (1) 100:3 turning (1) 99:22 Tustin (7) 71:19 74:17 75:24,25 76:3,7,11 TV (2) 100:2,3 two (9) 12:11 35:5 39:12 45:15 85:5 104:7 105:8 115:15	122:12 two-page (3) 33:15,25 131:13 Tylenol (1) 95:22 type (6) 19:6 41:20 73:12 82:12 110:18,19 typed (1) 24:9 types (1) 82:14 <hr/> U <hr/> U (2) 4:14,14 U.S.A (5) 22:14 23:23 29:22 30:10 106:12 ultimate (1) 68:19 undergo (1) 41:19 understand (27) 6:3,12 24:2 25:6 27:17 35:8,15,21 36:2 42:23 47:12 49:7 68:9 78:15 79:19 85:19 94:19 102:4 105:23 109:4 111:11 123:4 124:19 125:14,15 125:17,19 understandable (1) 40:23 understanding (5) 58:18 90:24 94:25 95:3 102:21 understood (5) 13:11 48:23,23 54:15 54:20 underwent (1) 87:2 unemployed (1) 36:18 unfortunately (1) 20:24 United (10) 1:2 65:17 67:5,8 69:19,23,25 70:25 79:14 86:5 university (10) 62:8,12 63:2,3,6,8,20 64:3,6 65:14 unknown (2) 101:19 115:23	unresponsive (1) 53:7 upset (2) 37:22 39:4 use (5) 39:13 48:6 70:17 88:24 118:19 uses (3) 39:10,13,14 usually (2) 40:9 92:24 <hr/> V <hr/> V (1) 4:2 vacancy (2) 126:3,4 vacate (11) 25:25 26:4 33:16 34:3 48:18 122:10 123:12 124:20 125:2 131:11,14 vacated (4) 36:10 48:24 57:23 58:19 vague (3) 27:7,22 30:4 Valley (10) 4:25 6:19 9:14 61:9 61:10 71:2,4 72:2 84:25 97:2 van (1) 41:13 vehicle (1) 114:23 verdict (1) 118:3 visibility (1) 113:22 visit (1) 81:2 vocabulary (1) 28:20 voice (1) 55:10 <hr/> W <hr/> wages (1) 111:8 wait (2) 49:15 108:13 waiting (1) 66:5 waive (1) 48:8 waived (2)	3:7 127:10 WALDMAN (1) 1:9 Wall (1) 2:19 wander (1) 110:7 want (19) 26:14 27:10 54:19 55:25 56:7,14 61:12 66:9 67:3 71:15 74:7 79:22 87:22 107:8 112:24 119:19 120:4,16 124:13 wanted (7) 18:7,11 20:12 57:13 79:21 98:2 119:23 wanting (1) 106:4 warehouse (1) 84:8 wasn't (11) 16:6 31:17 35:23 37:18 65:3,10 88:10 105:5 108:17,18 120:24 way (19) 39:6 40:21 51:13 52:2 52:16 54:8 58:8 72:20 104:5 105:8 109:6 110:2 111:2 113:7 114:2 125:12 125:15,17 132:20 we'll (3) 27:15 74:13 130:2 we're (9) 19:12 73:12 85:20 86:14 113:20 114:20 124:22 128:25 129:5 we've (1) 9:17 wear (1) 98:12 week (11) 25:13 45:2,10,18,23 92:22 93:4 105:24 107:22 108:2,6 went (19) 13:6 20:5,17 21:14 22:2,20 24:9 25:14 31:8 36:25 55:10 71:2 97:19 98:19 99:11 126:12,13,16 127:12
--	--	--	---	--

weren't (3) 8:17 23:2 35:13 West (3) 4:25 6:19 61:20 WHEREOF (1) 132:22 wife (4) 40:22 58:9 74:18 75:21 William (10) 1:12 2:18 5:16 71:17 73:21,24 75:24 76:3 76:7,12 win (1) 109:11 windows (1) 22:20 winter (1) 7:10 witness (25) 1:17 4:8,9,15 5:6 26:10 34:12 42:22 49:23 50:4 51:20 52:11 54:11 56:10 79:18 85:23 86:2 112:18 120:6 122:3 130:7 131:3 132:14 132:17,22 witness' (1) 57:16 won (3) 106:7,15,24 word (4) 118:19 121:5,6 126:3 words (1) 125:10 work (22) 8:3,8 12:19 13:6,12 13:14,18,20 20:20 21:12 22:3 39:15,18 39:21 66:19 72:5,19 73:13 94:20 103:19 105:13 112:15 worked (11) 7:3,24 8:11 37:5 64:17 91:18,22 92:14,15 102:12,17 working (21) 7:17 12:4 13:4 14:17 14:18 15:16 16:13 37:21 65:7 67:6,10 67:12,17 73:4,10 79:25 80:10 91:24 91:25 92:23 113:10 works (1) 74:10	worried (5) 18:14 99:23 100:17 110:12,24 worry (5) 32:18 40:16,22 48:5 113:5 wouldn't (5) 35:3 81:21 82:15 114:11 128:8 wrap (1) 48:14 written (1) 70:23 wrong (3) 39:2 83:4,12 wrongly (2) 38:11,21 <hr/> X <hr/> x (4) 1:4,14 4:2 131:2 <hr/> Y <hr/> Yeah (1) 67:2 year (12) 39:22 64:3 75:15 79:10 88:18,23 89:4 96:11 97:13,16 98:18 99:18 years (16) 12:20 61:17,22 62:9 62:10 64:6,16,19 66:14 67:24 69:7 85:5 92:7 96:8 104:7 105:8 yell (1) 52:8 yesterday (1) 25:22 York (16) 1:3,20,23 2:7,13,13 2:20,20 4:5,17 5:2 6:20 96:25 132:6,9 132:12 young (2) 1:11 66:17 <hr/> Z <hr/> Z (2) 4:2,14 <hr/> 0 <hr/> 1 <hr/> 1 (2)	68:24 69:13 1:16-cv-03499-GB... 1:7 10 (3) 43:12 107:9,13 10:33 (1) 1:21 100,000 (1) 88:6 10005 (1) 2:20 10017 (1) 2:13 107 (1) 131:6 11241 (2) 1:20 2:7 11580 (3) 5:2 6:20 61:14 119 (2) 131:22,23 125288 (1) 1:25 13 (6) 1:8 2:11 5:10 116:7 116:15,21 1304 (3) 101:25 102:6,13 15 (3) 68:25 69:7 83:16 16 (15) 1:19,20 2:6 18:23,25 19:11 111:14,17 112:10 113:10 114:5 115:12 116:3 116:6 131:9 163rd (1) 79:9 17 (6) 25:23 26:3,15 33:3 123:10 131:10 18 (10) 33:13,15,21 48:17 122:3 124:3 129:9 131:9,13,22 19 (6) 43:3 107:12,17,24 108:5 131:17 1969 (1) 60:7 <hr/> 2 <hr/> 2 (7) 33:18 34:5 48:21 54:22 68:24 69:14 131:16	20 (12) 4:25 6:19 61:20 119:8 119:10 121:14 124:2,6 126:6,7 127:25 131:20 20,000 (2) 46:19 47:14 2001 (1) 80:17 2002 (1) 61:7 2004 (1) 81:13 2006 (1) 67:15 2007 (6) 7:22 8:10 67:16 78:24 92:11,17 2010 (7) 9:4,11 40:24 41:5,9 72:25 88:12 2011 (2) 11:19 88:16 2012 (3) 8:10 12:3 84:19 2013 (3) 33:18 34:5 131:16 2015 (18) 7:5,6,15 13:8 15:17 39:25 48:21 66:23 88:23 89:3,4,7 96:4 112:14 122:3 123:23 124:3 131:22 2016 (11) 39:21 43:5 46:11 88:18,25 89:3 95:24 98:13 107:11 112:15 131:19 2017 (6) 1:20 95:13 98:7 130:14 132:23 133:23 21 (3) 119:14 120:12 131:23 212-660-1025 (1) 122:17 21st (1) 132:23 23 (1) 123:23 26 (1) 131:10 26th (1) 1:19 27th (1)	97:19 <hr/> 3 <hr/> 3 (1) 68:24 3:35 (1) 130:9 33 (1) 131:13 <hr/> 4 <hr/> 4 (2) 26:8 126:19 40 (1) 61:14 42,000 (2) 13:3 14:8 43 (1) 131:17 450 (1) 2:12 <hr/> 5 <hr/> 5 (1) 131:4 50,000 (1) 88:8 59 (1) 131:5 <hr/> 6 <hr/> 7 <hr/> 8 <hr/> 8 (1) 60:7 82 (1) 2:19 <hr/> 9 <hr/> 9 (1) 33:22 92 (1) 64:4
--	--	--	---	--